



PUBLIC DISCLOSURE

November 1, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FirstBank
RSSD# 288853

10403 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 institution'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 institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **OUTSTANDING**

The following table indicates the performance levels 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.*

SUMMARY OF THE MAJOR FACTORS SUPPORTING THE RATING

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing of 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

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) Interagency Examination Procedures for Large Institutions were utilized to evaluate the bank's Community Reinvestment Act (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. Full-scope reviews were performed on three of the bank's six delineated AAs, including the Denver-Boulder-Greeley Combined Statistical Area (CSA), Phoenix Metropolitan Statistical Area (MSA), and the Coachella Valley Metropolitan AA, while the Fort Collins MSA, Colorado Springs MSA, and Mountain AA received limited-scope reviews. The following data was reviewed in the evaluation:

- The bank's home mortgage loans reported on the bank's 2018, 2019, and 2020 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business loans reported on the bank's 2018, 2019, and 2020 Community Reinvestment Act (CRA) data file;
- CD loans originated from January 1, 2019 through June 30, 2021;
- Qualified investments that were made from January 1, 2019 through June 30, 2021, qualified investments made prior to but still outstanding during this period, and qualifying grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2019 through June 30, 2021.

Table 1 illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state totals, and the bank's June 30, 2020 deposit market share as a percent of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions. Given the bank's loan and deposit volumes and greater market share, the Colorado rating carries the greatest weight in determining the overall bank performance. Moreover, home mortgage lending generally carried more weight in the analysis due to its larger volume of loans compared to the bank's small business lending. While other purpose and purpose not applicable loans reported on the

HMDA LARs are included in the home mortgage tables, these were not analyzed as part of the geographic and borrower distribution analyses.

Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ ¹		Percent of Bank's Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Colorado		91	92.0	100.0	94.2	100.0		
Denver-Boulder-Greeley CSA AA	Full	68	68.9	74.9	77.8	82.5	12.6	3 rd of 77
Fort Collins MSA AA	Limited	5	7.0	7.6	4.1	4.3	8.5	5 th of 25
Colorado Springs MSA AA	Limited	7	4.9	5.4	3.7	3.9	7.2	4 th of 39
Mountain AA	Limited	11	11.1	12.1	8.7	9.2	22.7	2 nd of 17
State of Arizona		14	6.1	100.0	3.4	100.0		
Phoenix MSA AA	Full	14	6.1	100.0	3.4	100.0	0.5	15 th of 59
State of California		4	1.8	100.0	2.4	100.0		
Coachella Valley Metropolitan AA	Full	4	1.8	100.0	2.4	100.0	1.4	14 th of 29

¹ Based on the bank's outstanding loan balances as of June 30, 2021.
² Based on the June 30, 2020 FDIC's Market Share Report.
³ Based on the bank's ranking among FDIC-insured financial institutions in each AA.

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, 2021.
- The bank operates 109 full-service banking offices, with 91 locations in the state of Colorado, 14 in Arizona, and 4 in California.
- The bank's primary business focus is residential and commercial real estate lending, followed by commercial loans, as well as consumer and commercial credit cards, and cash reserve accounts.

TABLE 2 COMPOSITION OF LOAN PORTFOLIO AS OF JUNE 30, 2021		
Loan Type	\$ (000)	%
Residential Real Estate	7,197,620	53.8
Commercial	5,499,236	41.1
Other	607,958	4.5
Consumer	70,186	0.5
Agricultural	5,491	0.1
Gross Loans	13,380,491	100.0

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

The bank was rated Outstanding under the CRA at its April 1, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

While conclusions with respect to lending performance were evaluated for three years, only 2020 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank's 2019 and 2018 lending data for AAs that received full-scope reviews can be found in Appendix D of this report. Lending data for AAs that received limited-scope reviews are located in Appendix E. The performance evaluation first discusses the bank's overall performance, followed by an in-depth analysis of the bank's record of lending, investment, and service activities in each state and specific AAs.

LENDING TEST

The bank's overall performance under the lending test is high satisfactory. The lending test ratings for the states of Colorado and Arizona are high satisfactory, while the state of California was rated low satisfactory. The ratings for Colorado and Arizona were bolstered by the significant level of CD lending in each respective state.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect good responsiveness to AA credit needs. The bank's overall loan origination volume has increased since the prior evaluation, driven primarily by the bank's significant participation in the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic). Through June 30, 2021, the bank originated 20,321 PPP loans totaling \$1.5B and was the top PPP originator in Colorado.

TABLE 3
SUMMARY OF LENDING ACTIVITY REVIEWED

Loan Type	2018-2020			
	#	\$(000)	#%	\$%
Home Purchase	9,883	3,723,065	40.2	46.7
Home Refinance	7,610	2,473,838	30.9	31.1
Home Improvement	4,111	358,470	16.7	4.5
Multifamily	461	1,125,988	1.9	14.1
Other Purpose Closed-End	1,010	112,598	4.1	1.4
Other Purpose LOC	1,525	172,179	6.2	2.2
Total HMDA Loans	24,600	7,966,138	100.0	100.0
Small Business Loans	21,200	1,702,960	100.0	100.0
Small Farm Loans	0	0	0.0	0.0
Total Loans	45,800	9,669,098	100.0	100.0

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers flexible programs throughout its AAs, including government guaranteed loans and affordable housing program loans. Such loans help borrowers who might not otherwise qualify for credit. These 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 31 FHA loans for \$7.6 million (MM).
- Besides PPP loans, the bank participates in the SBA 7(a) and 504 loan programs to provide support for small business borrowers. The bank is the most active SBA lender in Colorado and the top lender in 2020. From 2019 through June 30, 2021, the bank originated 75 SBA loans for \$58.0MM and nine SBA 7(a) loans for \$12.0MM.
- 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 \$442.3MM in affordable housing loans for a total of 2,114 affordable housing units.
- In addition to its affordable housing programs, the bank offers a "Mortgage Modification Program" that allows LMI borrowers to modify an existing mortgage at a reduced rate or shorter amortization term, along with reduced fees from a typical refinancing. Overall, 697 LMI borrower loans were modified in 2019 and 2020.
- The bank also offers a HMDA Second Look Program to all HMDA-covered applications from LMI borrowers. The program ensures that a highly experienced lender reviews these applications so as to consider approval under all available loan programs and with competitive interest rates.
- 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 following programs and accomplishments are noted.
 - Boulder's Permanently Affordable Homeworks Program – Homes under this program are sold at below market-rate prices to eligible LMI borrowers through a managed deed

restricted program. The bank originated 12 mortgage loans under this program in 2019 and 2020.

- 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 2018 and 2020, the bank originated 18 loans under this program.
- Elevation Community Land Trust (ECLT) – Using a similar model as CCLT, ECLT created its program in 2020. To date, the bank has originated four ECLT loans.
- 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 2018 to mid-year 2021, the bank originated 16 loans under the program.
- Impact Development Fund Down Payment Assistance Program – This program is sponsored by a local CDFI serving the Denver and Fort Collins, Colorado Metropolitan areas. From 2018 through 2020, the bank originated 19 loans through the program.
- Landed Down Payment Assistance Program – This is a down payment assistance program through an equity share program available to Denver and Jefferson County school district employees. The partner organization is able to offer assistance for up to 15.0 percent of the purchase prices for a 25.0 percent equity share that is repaid when the home sells. Between 2018 and 2020, the bank originated 36 loans through the program.
- Trellis Down Payment Assistance Program – The bank has been a partner with the Trellis affordable housing agency since 2015. In 2019 and 2020, the bank originated 12 down payment assistance loans to LMI borrowers for \$333,216. Additionally, the bank also purchased 20 loans totaling over \$2.1MM to provide liquidity to the organization.
- The bank purchased 55 loans in the amount of \$7.2MM from Habitat for Humanity's (Habitat) Colorado affiliates in 2019 and 2020. The purchase provides Habitat with additional liquidity to build more homes for LMI families as well as down payment assistance programs and interest free loans.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. As illustrated in Table 4, a substantial majority of the bank's total loans included in this analysis, by number and dollar, were originated inside the bank's AAs.

Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	9,787	3,686,472	99.0	99.0	96	36,593	1.0	1.0
Home Refinance	7,559	2,452,871	99.3	99.2	51	20,967	0.7	0.8
Home Improvement	4,098	354,958	99.7	99.0	13	3,512	0.3	1.0
Multifamily	452	1,108,836	98.0	98.5	9	17,152	2.0	1.5
Other Closed/Exempt	1,000	108,479	99.0	96.3	10	4,119	1.0	3.7
Other Open	1,518	171,184	99.5	99.4	7	995	0.5	0.6
N/A	0	0	0.0	0.0	0	0	0.0	0.0
Total HMDA Loans	24,414	7,882,800	99.2	99.0	186	83,338	0.8	1.0
Small Business Loans	20,687	1,658,563	97.6	97.4	513	44,397	2.4	2.6
Total Loans	45,101	9,541,363	98.5	98.7	699	127,735	1.5	1.3

Note: Percentages may not add to 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. The bank's overall geographic distribution of lending reflects adequate penetration throughout the AAs. The state ratings for Colorado and California are consistent with the overall rating, while the bank's performance in Arizona is good.

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 sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The penetration of loans among borrowers of different income levels was adequate in all three states evaluated.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank is a leader in making CD loans. Table 5 illustrates all CD loans originated during the review period. The performance in Colorado and Arizona is excellent, while the performance in California is very poor. Overall, the bank is particularly responsive in extending loans to address area affordable housing needs, which aligns with its overall strategic emphasis. The Colorado AAs had the highest volume of CD loan activity during the review period, with approximately 94.1 percent of bank-wide CD loans by number. In addition, 70.1 percent of the Colorado loans supported affordable housing needs and community services targeted to LMI individuals or families. Also, based on the bank meeting the credit and CD needs of its communities within its AAs, consideration was given to a \$15.1MM CD loan to revitalize and stabilize an area in Grand Junction, Colorado, outside the bank's AAs, but originated within a broader statewide area.

Additional details of the bank's specific CD loan performance results are further discussed in the analysis of each state and individual AAs. Examples of responsive CD lending activities among all AAs include:

- A \$13.7MM loan was originated in Boulder, Colorado, to construct an apartment complex that provides affordable housing.
- A \$10.9MM loan was originated to a non-profit organization to aid in funding the construction of a recuperative care facility for the homeless.
- A \$38.6MM loan was made for the purpose of developing an urban area located in a moderate-income tract in Lafayette, Colorado, that supported the revitalization and stabilization of the area and also included initiatives that supported permanent job creation.
- A \$1.3MM loan was made to a recreational facility located in a low-income tract in Colorado Springs that supports ongoing economic development needs of the area.

**TABLE 5
COMMUNITY DEVELOPMENT LOANS
BANKWIDE**

Community Development Purpose	#	\$(000's)
Affordable Housing	202	617,031
Community Services	96	37,624
Economic Development	75	144,005
Revitalization and Stabilization	63	304,374
TOTAL LOANS*	436	1,103,034

* Includes 21 loans for \$72.2MM originated at the Colorado statewide level benefitting multiple assessment areas

INVESTMENT TEST

The bank's overall performance under the investment test is outstanding, with outstanding performance across all three states.

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

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AAs. Table 6 illustrates the total numbers of investments and donation activities by CD purpose, including an itemization of prior-period investments that remain on the bank's balance sheet, and new investments purchased during the current evaluation period. Investment instruments generally consisted of a variety of private bonds, tax credits for low-income housing, investments in affordable housing equity funds, and investment funding for small business investment companies (SBICs). The bank had several investments benefiting the entire state of Colorado, including the bank's AAs in the state, as well as two investments that provided benefits across two or more states. Examples of the bank's responsive CD investments include:

- The bank purchased a total of 66 municipal and private placement bonds totaling \$276.9MM that spanned across three of the four CD purpose categories, including affordable housing, community service, and revitalization and stabilization, with a substantial majority (82.7 percent) meeting the affordable housing and community service needs of the bank's AAs.
- The bank purchased nine low-income housing tax credits (LIHTCs) totaling \$14.2MM supporting the creation and improvement of affordable housing through investments in several non-profit organizations and local housing authorities.
- The bank invested in seven equity equivalent (EQ2s) investments for \$6.3MM supporting microlending and emergency programs for small businesses as well as affordable housing and down payment assistance programs.
- The bank purchased two investments totaling \$8.1MM directed to AA economic development needs through funding SBICs, which provided start-up, expansion, and ongoing capital to small businesses across several states including Colorado, Arizona, and California.

TABLE 6 INVESTMENTS, GRANTS, AND DONATIONS BANKWIDE								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	25	76,231	17	83,643	100	778	142	160,652
Community Services	21	57,086	10	52,821	547	4,775	578	114,682
Economic Development	2	3,765	3	6,535	9	94	15	10,394
Revitalization and Stabilization	6	25,312	0	0	4	16	10	25,328
TOTAL	54	162,393	30	143,000	660	5,663	744	311,056

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, as well as to organizations that promote small business growth through economic development initiatives. Examples of the bank's responsive philanthropic activities include:

- A \$47.0 thousand (M) donation was made to a non-profit organization that provides home ownership counseling and financial access to LMI individuals in the Phoenix area.
- A \$35.0M donation was made to a Denver area non-profit focused on childhood development and early literacy, education, and economic stability.
- One donation of \$25.0M was made to a Colorado relief fund focused on supporting area restaurants that were impacted by the pandemic.

SERVICE TEST

The bank's overall performance under the service test is outstanding with outstanding performance across all three states.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geography classification. Table 7 illustrates the distribution of bank offices and full-service automated teller machines (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 total percentage of census tracts by income level throughout the bank's AAs. Additionally, several of the bank's branches located in middle- and upper-income geographies are located in close proximity to LMI tracts, further supporting the accessibility of the bank's branch and ATM network to all tract income levels.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. During the evaluation period, the bank opened two branch offices and closed ten branch offices in Colorado along with one other closure in Arizona. As shown in Table 7, the majority of branch closures were in middle and upper-income geographies.

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 lobby hours generally open eight hours a day Monday through Friday along with Saturday morning lobby and drive-through hours.

TABLE 7 RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES BANKWIDE											
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)				
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk
	3.7	14.7	35.8	45.9	0.0	100.0	8.9	24.1	34.5	31.3	1.2
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)				
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk
	3.7	14.8	36.1	45.4	0.0	100.0	8.9	24.1	34.5	31.3	1.2
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)				
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	109	2		11		0	(2)	(5)	(2)	0	(9)
Community Development Services	Affordable Housing	Community Services		Economic Development	Revitalization & Stabilization		Total Services		Total Organizations		
	155	517		27	17		716		258		

¹ Based on 2020 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 AAs in each state. CD services were also evaluated in light of the pandemic; however, it is noted that the bank's volume of CD services conducted during the pandemic remained consistent with other years included in the evaluation and reflected responsiveness to the evolving needs of area organizations during the pandemic. As illustrated in Table 7, bank representatives provided 716 services to 258 area organizations, with a significant portion of services provided to well-known organizations that provide varying levels of community services to LMI individuals and families. Examples of CD services include:

- Eleven bank representatives provided 28 services to a Colorado scholastic organization responsible for providing scholarships to LMI individuals in pursuit of higher education at one of five prospective Colorado institutions of higher education.
- Eight bank representatives provided 11 services to a well-known non-profit agency that offers a multitude of community services to LMI individuals and families, including financial assistance and education, access to essential resources, and affordable housing.
- Five bank representatives provided 14 services to a local non-profit organization focused on providing community services to the most vulnerable citizens in the area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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 Federal Reserve Bank of Kansas City (Reserve Bank), however, retains authority for 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 and Practices identified by the CFPB.

STATE OF COLORADO

CRA RATING FOR COLORADO:

The lending test is rated: **Outstanding**
The investment test is rated: **High Satisfactory**
The service test is rated: **Outstanding**
The service test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

For the state of Colorado, a full-scope review of the bank's Denver-Boulder-Greeley CSA AA was conducted. The overall state rating was based on the bank's performance in the aforementioned AA, along with limited-scope reviews of the Fort Collins MSA AA, the Colorado Springs MSA AA, and the Mountain AA. Limited-scope reviews were conducted to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates four of its six AAs and operates 91 of its 109 branches 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 residential and commercial real estate lending. Detailed descriptions of the bank's operations in the Denver-Boulder-Greeley AA are provided in the analysis for that AA that follows.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Lending Activity

The bank's lending activities in the state of Colorado reflect good responsiveness to AA credit needs. The evaluation of loans in the state included 22,336 home mortgage and 19,389 small business loans originated during a three-year period between January 1, 2018 and December 31, 2020. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank had significant lending levels in the state of Colorado during the three-year evaluation period, with more recent attention devoted to PPP loan originations in response to the pandemic, while also focusing on residential real estate lending. A description of the bank's flexible lending products is discussed previously in the overall Institution section.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Colorado reflects adequate penetration throughout its AAs. The distribution of loans across different geographies is adequate 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 the state of Colorado has an overall adequate penetration among individuals of different income levels and businesses of different sizes. Additionally, the distribution of loans to

borrowers of different income levels and business of different sizes is adequate in the Denver-Boulder-Greeley CSA AA.

Community Development Lending

In the state of Colorado, the bank is a leader in providing CD loans, which bolstered the lending test rating in the state to high satisfactory. As shown in Table 8, the bank originated 410 CD loans totaling \$1.0B in the state of Colorado, of which 21 loans for \$72.2MM benefited the greater statewide area as well as the bank's four Colorado AAs. The Denver-Boulder-Greeley CSA AA included 273 CD loans totaling \$752.2MM, or 66.6 percent by number and 72.5 percent by dollar volume of all CD loans originated bank-wide. As previously noted, the bank was cited as the top lender for PPP loans in the state of Colorado, which heavily contributed to ongoing economic development and revitalization/stabilization efforts in the state. The following are specific examples of CD loans that were responsive to AA needs:

- The bank originated a \$26.7MM loan to a housing authority for the purpose of developing affordable housing in downtown Boulder. The LIHTC project associated with this loan will require the property to offer low-income housing with various covenants related to renter income and area median income.
- The bank originated a \$4.3MM loan as part of a local redevelopment initiative to improve a property in a moderate-income census tract that will help to attract and retain existing businesses and residents in this specific area.
- The bank originated a \$1.6MM loan to a property management company for the acquisition and renovation of one of the Denver area's most iconic hospitality establishments, supporting job creation in the area.

**TABLE 8
COMMUNITY DEVELOPMENT LOANS
STATE OF COLORADO**

Community Development Purpose	#	\$(000's)
Affordable Housing	196	586,443
Community Services	92	36,814
Economic Development	65	118,161
Revitalization and Stabilization	57	295,748
TOTAL LOANS	410	1,037,166

INVESTMENT TEST

The bank's overall performance in the state of Colorado under the investment test is outstanding. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AAs. Qualified CD investment activity in the Denver-Boulder-Greeley CSA AA was excellent, with consistent performance in the limited-scope review of the Colorado Springs MSA AA and below the state rating in the Fort Collins MSA AA and Mountain AA.

Table 9 illustrates the breakdown of the bank's investments, grants, and donations in greater detail. CD investments were primarily directed to affordable housing initiatives, while the bank's donation activity was overwhelmingly targeted to community services.

One of the statewide donations deserving special mention is the bank's continued partnership with the Community First Foundation and joint sponsorship of the highly successful Colorado Gives Day event. This one-day annual event dating back to 2010 is recognized nationally as the largest single-day fundraising campaign across the country, raising over \$50.1MM for 2,828 charitable organizations across the state of Colorado in 2020. Each year from 2018 to 2020, the bank provided a \$500.0M incentive fund along with an additional \$100.0M in cash prizes to spur engagement among participating nonprofits. The portion of the bank's donation/incentive fund provided to organizations that support LMI individuals and families, LMI geographies, and small businesses in the amount of \$712.5M was considered a qualified donation. Additionally, the following are specific examples of responsive investments to address AA needs:

- Nine LIHTCs investments totaling \$14.2MM were made to support affordable housing initiatives benefiting LMI individuals.
- One EQ2 investment totaling \$500.0M went to a CDFI to help fund loans to qualified small businesses that were impacted by the pandemic.
- The bank made a \$50.0M donation to an organization that designed, manufactured, and tested medical and protective equipment to address critical shortages for frontline workers during the pandemic.
- A \$75.0M donation was made to a relief fund sponsored by the state government and a non-profit organization to provide aid and support to Colorado communities affected by the pandemic.

**TABLE 9
INVESTMENTS, GRANTS, AND DONATIONS
STATE OF COLORADO**

Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	21	70,117	17	83,643	84	640	122	154,400
Community Services	8	39,494	3	35,166	483	3,026	494	77,686
Economic Development	1	750	1	500	9	94	11	1,344
Revitalization and Stabilization	5	24,726	0	0	4	16	9	24,742
TOTAL	35	135,087	21	119,309	580	3,776	636	258,172

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the state of Colorado is outstanding. The performance in the Denver-Boulder-Greeley CSA AA was excellent with consistent results in the limited-scope review AAs.

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 each AA. Of the bank's 90 full-service offices with ATMs, 18 are located in LMI tracts. The distribution of branches within the Colorado AAs is generally proportional to the percent of census tracts by income level, with several the bank's branches located in middle- and upper-income geographies located in close proximity to LMI tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There were two new branches opened in the state since the prior evaluation, both located in upper-income tracts. Ten full-service branches were closed, including two in moderate-, four in middle-, and four in upper-income tracts.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's operations and product offerings in the state generally mirror that of the overall institution, which is described in the overall retail banking services section.

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
	3.3	16.5	36.3	44.0	0.0	100.0	7.2	23.8	35.9	32.0	1.2	100.0
Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.3	16.7	36.7	43.3	0.0	100.0	7.2	23.8	35.9	32.0	1.2	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	91	2		10		0	(2)	(4)	(2)	0	(8)	
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization	Total Services		Total Organizations			
	140	460		27		14	641		229			

¹ Based on 2020 FFIEC census tract definitions.

(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank is a leader in providing CD services in its Colorado AAs. This conclusion is heavily weighted by the bank's performance in the Denver-Boulder-Greeley CSA AA and secondarily by the number of services provided in the Mountain AA, which is the second largest AA in the state. During the evaluation period, bank representatives performed 641 services to 229 organizations throughout Colorado, including 84 services that provided benefits to a broader statewide area that also benefited multiple bank AAs in the state. The services provided were generally most responsive to organizations that provide community services to LMI individuals and families. Examples of CD services provided in Colorado include:

- A bank representative serves as the board of director's (board) president to an organization that provides resources to advance small business ownership opportunities for the Latino and Hispanic community.
- A bank representative serves on the Executive Committee and board of an organization that provides court-appointed volunteers to represent children in the court system who have experienced abuse or neglect.
- A bank representative serves on the board of a religious organization that provides affordable and service-enriched housing for LMI individuals and families.

**DENVER-BOULDER-GREELEY COMBINED STATISTICAL AREA 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 CSA AA is comprised of ten counties in their entireties (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 an AA map).

- The AA is comprised of 766 total census tracts, including 63 low-, 180 moderate-, 261 middle-, and 253 upper-income tracts. The AA also includes 9 tracts with unknown income levels. The composition of each MSA has not changed since the prior evaluation, although the AAs were reviewed separately at that evaluation.
- The bank operates 68 banking offices in the AA, including its headquarters in Lakewood. Two banking offices are located in low-, 11 are in moderate-, 28 are in middle-, and 27 are in upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 12.6 percent market share of deposits in the AA, ranking 3rd of 77 FDIC-insured financial institutions operating from 809 banking offices in the AA.
- During the evaluation, a community contact was conducted with a member of an organization that assists small businesses. Four other community contacts recently conducted as part of the CRA evaluation 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 four prior contacts represented a small business development organization, an affordable housing agency, and two economic development entities.

**TABLE 11
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Denver-Boulder-Greeley CSA	3,090,874	3,284,952	6.3
Adams County, CO	441,603	471,206	6.7
Arapahoe County, CO	572,003	608,310	6.3
Boulder County, CO	294,567	310,032	5.3
Broomfield County, CO	55,889	60,699	8.6
Clear Creek County, CO	9,088	9,136	0.5
Denver County, CO	600,158	649,654	8.2
Douglas County, CO	285,465	306,974	7.5
Elbert County, CO	23,086	23,855	3.3
Gilpin County, CO	5,441	5,605	3.0
Jefferson County, CO	534,543	552,344	3.3
Park County, CO	16,206	16,189	(0.1)
Weld County, CO	252,825	270,948	7.2
Boulder, CO MSA	294,567	310,032	5.3
Denver-Aurora-Lakewood, CO MSA	2,543,482	2,703,972	6.3
Greeley, CO MSA	252,825	270,948	7.2
Colorado	5,029,196	5,278,906	5.0

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

- Population trends reflected in Table 11 between 2010 and 2015 reflect growth throughout the AA, with the largest growth rates in Broomfield and Denver Counties. The overall CSA population growth was greater when compared to the overall growth at the state level.
- The Denver-Boulder-Greeley CSA AA contains 62.2 percent of the population of the state of Colorado.
- A majority of the AA population resides within Adams, Arapahoe, Boulder, Denver, Douglas, Jefferson, and Weld Counties, with nearly 3.2MM residents. The population in these counties is substantially greater than Broomfield, Clear Creek, Elbert, Gilpin, and Park Counties' combined populations.

**TABLE 12
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Denver-Boulder-Greeley CSA	81,907	80,368	(1.9)
Adams County, CO	68,456	66,619	(2.7)
Arapahoe County, CO	78,904	76,437	(3.1)
Boulder County, CO	95,675	96,926	1.3
Broomfield County, CO	102,508	97,886	(4.5)
Clear Creek County, CO	79,639	86,563	8.7
Denver County, CO	62,268	69,783	12.1
Douglas County, CO	118,274	115,309	(2.5)
Elbert County, CO	90,464	96,535	6.7
Gilpin County, CO	89,982	75,694	(15.9)
Jefferson County, CO	88,353	86,565	(2.0)
Park County, CO	80,381	69,234	(13.9)
Weld County, CO	70,777	70,457	(0.5)
Boulder, CO MSA	95,675	96,926	1.3
Denver-Aurora-Lakewood, CO MSA	81,781	80,820	(1.2)
Greeley, CO MSA	70,777	70,457	(0.5)
Colorado	76,277	74,826	(1.9)

Source: 2006-2010 U.S. Census Bureau: American Community Survey

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

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

- The median family incomes (MFI) throughout the AA counties vary significantly, with a majority experiencing negative growth rates.
- The percentage of families below poverty in the AA was 8.0 percent, which is comparable to the Colorado statewide figure of 8.5 percent.

**TABLE 13
HOUSING COST BURDEN**

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver-Boulder-Greeley CSA	80.1	46.5	46.3	67.5	48.3	23.4
Adams County, CO	80.1	45.3	47.9	69.0	48.6	27.2
Arapahoe County, CO	83.9	47.4	48.6	71.1	50.2	23.4
Boulder County, CO	82.6	54.2	52.6	63.3	43.8	21.6
Broomfield County, CO	81.1	68.7	40.8	68.9	43.2	20.5
Clear Creek County, CO	71.6	26.5	39.2	55.4	48.1	22.9
Denver County, CO	76.4	40.4	44.7	65.7	43.7	24.1
Douglas County, CO	82.2	69.1	37.1	74.5	62.3	21.0
Elbert County, CO	79.0	21.9	35.8	77.9	61.2	31.2
Gilpin County, CO	87.1	42.1	41.2	87.0	55.9	34.7
Jefferson County, CO	83.7	46.4	45.7	66.2	46.4	21.6
Park County, CO	75.9	49.7	49.1	57.2	49.3	30.7
Weld County, CO	73.9	47.8	43.9	65.4	49.4	24.1
Boulder, CO MSA	82.6	54.2	52.6	63.3	43.8	21.6
Denver-Aurora-Lakewood, CO MSA	80.1	45.8	45.7	68.3	48.5	23.5
Greeley, CO MSA	73.9	47.8	43.9	65.4	49.4	24.1
Colorado	79.5	46.1	46.5	65.2	45.7	23.9

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- Housing affordability is constrained, yet similar, throughout the AA counties with the greatest cost burden to low-income renters in Arapahoe and Gilpin Counties and to low-income homeowners in Elbert and Gilpin Counties.
- The overall affordability ratio¹ is very low within the AA at 24.3 percent, which is similar to the ratio for the state of Colorado, at 24.5 percent.
- A community contact representing a housing and finance authority discussed the strong need for down payment assistance and low interest rates to facilitate the construction of affordable housing units.
- Another member of the community noted there are very few affordable housing units in the area.

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**

Region	2016	2017	2018	2019	2020
Denver-Boulder-Greeley CSA	2.9	2.5	2.9	2.5	7.3
Adams County, CO	3.4	2.8	3.2	2.8	8.0
Arapahoe County, CO	3.0	2.6	3.0	2.6	7.9
Boulder County, CO	2.6	2.2	2.6	2.3	6.2
Broomfield County, CO	2.8	2.4	2.7	2.4	6.6
Clear Creek County, CO	3.0	2.4	2.8	2.4	8.5
Denver County, CO	3.0	2.6	2.9	2.6	8.2
Douglas County, CO	2.5	2.2	2.6	2.3	5.8
Elbert County, CO	2.5	2.3	2.6	2.1	4.7
Gilpin County, CO	2.3	1.9	2.3	2.2	11.3
Jefferson County, CO	2.8	2.4	2.8	2.4	7.1
Park County, CO	2.7	2.2	2.6	2.4	5.7
Weld County, CO	3.3	2.5	2.8	2.5	7.0
Boulder, CO MSA	2.6	2.2	2.6	2.3	6.2
Denver-Aurora-Lakewood, CO MSA	3.0	2.5	2.9	2.6	7.5
Greeley, CO MSA	3.3	2.5	2.8	2.5	7.0
Colorado	3.1	2.6	3.0	2.7	7.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA remained relatively aligned with the overall statewide figure for Colorado, with notable spikes during 2020 as a result of the pandemic.
- Major employers in the Denver-Boulder-Greeley CSA include Denver International Airport (35,000 employees), HealthONE Corporation (110,050), Lockheed Martin (14,000), Centura Health (8,310), SCL Health Systems (8,270), and Century Link (6,500).
- A member of the community indicated that various entities including credit unions, community development corporations, and CDFIs can offer funding to small businesses that do not qualify for loans at traditional banks. The community member also mentioned that the significant amount of paperwork involved in starting and managing a business remains a barrier to credit.
- Another community contact indicated that office ownership for many businesses is unattainable due to high real estate prices.

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. The lending test rating was bolstered by the bank acting as a leader in making CD loans in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 16,187 home mortgage loans and 14,910 small business loans originated between January 1, 2018 and December 31, 2020.

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 institutional description.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2020 home mortgage loans among low-income census tracts was above the aggregate lending data. When reviewed in comparison to the percentage of owner-occupied units in each census tract income level (demographic figure), the bank's distribution of home mortgage loans was also above the demographic figure. Lending levels in the moderate-income census tracts were comparable to the aggregate lending data and comparable to the demographic figure.

The bank's home mortgage lending in 2019 and 2018 reflected penetration levels that were consistent with that of the 2020 lending patterns. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any significant gaps or lapses in any of the three years.

Home Purchase Loans

The geographic distribution of home purchase lending is good. The distribution of 2020 home purchase loans among low-income census tracts was above the aggregate lending data by number and dollar, and above the demographic figure. Lending levels in moderate-income census tracts were comparable to both the aggregate lending data and the demographic figure.

The bank's home purchase lending in 2019 was below the 2020 performance levels while the 2018 lending was consistent with the performance in 2020. Furthermore, the bank's loan dispersion among

geographies of different income levels did not reveal any noteworthy gaps or lapses in any of the three years.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2020 home refinance loans among low-income census tracts was above the aggregate lending data and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data and to the demographic figure.

The bank's home refinance lending in 2019 and 2018 reflected penetration levels that were consistent with the bank's performance in 2020. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses in any of the three years.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The distribution of home improvement loans among low-income census tracts in 2020 was above the aggregate lending data by number and dollar while comparable to the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data and below the demographic figure.

The bank's home improvement lending in 2019 and 2018 reflected penetration levels that were consistent with the bank's performance in 2020. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses in any of the three years.

Multifamily Loans

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

The bank's multifamily lending in 2019 was consistent with 2020 lending levels while 2018 reflected penetration levels that were below the bank's performance in 2020. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses in any of the three years.

Table 15
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	165	8.5	4.7	53,173	6.8	3.8	4.3
Moderate	361	18.6	18.4	104,350	13.3	14.3	18.7
Middle	571	29.4	35.1	204,844	26.0	32.3	36.0
Upper	844	43.5	41.7	424,621	54.0	49.6	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,941	100.0	100.0	786,988	100.0	100.0	100.0
Refinance Loans							
Low	123	5.2	3.3	29,885	3.7	2.6	4.3
Moderate	380	16.2	15.0	88,673	11.1	12.0	18.7
Middle	756	32.2	34.1	217,935	27.3	31.3	36.0
Upper	1,090	46.4	47.6	463,236	57.9	54.0	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2,349	100.0	100.0	799,729	100.0	100.0	100.0
Home Improvement Loans							
Low	38	4.1	2.9	3,114	3.4	2.6	4.3
Moderate	87	9.5	12.6	7,264	7.9	10.4	18.7
Middle	270	29.4	31.4	23,131	25.1	28.0	36.0
Upper	523	57.0	53.1	58,471	63.6	59.0	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	918	100.0	100.0	91,980	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	33	27.3	18.9	61,269	21.3	7.5	14.3
Moderate	41	33.9	29.5	92,971	32.4	27.9	29.9
Middle	30	24.8	33.7	90,999	31.7	45.4	37.3
Upper	17	14.0	17.9	41,972	14.6	19.2	18.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	121	100.0	100.0	287,211	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	372	6.4	3.7	148,310	7.3	3.1	4.3
Moderate	928	15.9	16.1	299,177	14.8	13.1	18.7
Middle	1,765	30.2	34.2	549,490	27.1	31.9	36.0
Upper	2,779	47.6	46.1	1,029,616	50.8	51.9	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5,844	100.0	100.0	2,026,593	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

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

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

Table 16 Distribution of 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	8	2.3	2.9	726	1.8	2.1	4.3
Moderate	32	9.3	11.6	3,564	8.8	8.0	18.7
Middle	79	23.0	31.6	6,754	16.7	27.6	36.0
Upper	225	65.4	53.8	29,304	72.6	62.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	344	100.0	100.0	40,348	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	5	2.9	3.4	143	0.7	2.1	4.3
Moderate	27	15.8	15.0	2,355	11.6	9.0	18.7
Middle	59	34.5	31.1	5,827	28.7	22.3	36.0
Upper	80	46.8	50.4	12,012	59.1	66.6	40.9
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	171	100.0	100.0	20,337	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.9	0	0.0	3.3	4.3
Moderate	0	0.0	42.1	0	0.0	21.4	18.7
Middle	0	0.0	28.2	0	0.0	32.8	36.0
Upper	0	0.0	24.8	0	0.0	42.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Small Business Lending

The geographic distribution of small business lending from 2018 to 2020 is adequate. The distribution of 2020 small business loans among LMI census tracts was comparable to the aggregate lending data by number and dollar, as well as the demographic figure.

The distribution of small business lending in 2019 and 2018 was generally consistent with 2020 performance. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

Table 17 Distribution of 2020 Small Business Lending By Income Level of Geography Assessment Area: Denver-Boulder-Greeley CSA							
Geographic Income Level	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	652	5.8	7.0	70,096	9.1	9.5	6.6
Moderate	1,944	17.2	19.6	164,704	21.3	22.4	19.8
Middle	3,492	30.8	32.1	227,042	29.3	30.5	33.6
Upper	5,223	46.1	40.5	308,505	39.9	36.5	39.7
Unknown	20	0.2	0.3	3,254	0.4	0.7	0.3
Tract-Unk	0	0.0	0.5	0	0.0	0.4	
Total	11,331	100.0	100.0	773,601	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

The bank's lending has an adequate penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank's home mortgage lending data includes a large volume of investment properties for home purchases and refinancings that resulted in a higher percentage of loans where the income level was unknown and significantly higher than the aggregate lending data. As such, the lending data was recalibrated to remove loans with unknown incomes for both the bank and aggregate lending data to derive a more appropriate comparison. Using the revised data revealed the penetration of 2020 loans to low-income borrowers was above the aggregate lending data by number, comparable to aggregate lending data by dollar, and below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The penetration levels of 2019 and 2018 home mortgage lending were consistent with 2020 performance, with a distribution of loans generally comparable to the aggregate lending data by number of loans.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The bank's performance was evaluated by factoring out the loans with unknown incomes from both bank lending and the aggregate data as stated above. The penetration of 2020 loans to low-income borrowers was above the aggregate lending data by number and dollar and below the demographic figure. Lending to moderate-income

borrowers was below the aggregate lending data by number and dollar and comparable to the demographic figure.

The overall penetration levels of 2019 and 2018 home purchase lending were consistent with 2020 performance, with a distribution of loans to moderate-income borrowers falling below the aggregate data and the demographic figure for 2018 but comparable for 2019.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. Again, the loans with unknown incomes from both the bank's lending and the aggregate data were factored out to derive a more consistent comparison. The penetration of 2020 loans to low-income borrowers was above the aggregate lending data by number, comparable by dollar amount, and below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data and to the demographic figure.

The penetration levels of 2019 home refinance lending were consistent with 2020 performance, with a distribution of loans generally comparable to the aggregate lending data by number, while 2018 performance fell below the levels noted in 2019 and 2020.

Home Improvement Loans

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

The overall penetration levels of 2019 and 2018 home improvement lending were consistent with that of 2020 performance.

Table 18 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Boulder-Greeley CSA						
Borrower Income Level	Bank And Aggregate Loans				Families by Family Income %	
	Bank	Agg	Bank	Agg		
Home Purchase Loans						
Low	110	5.7	5.2	25,092	3.2	2.7
Moderate	217	11.2	22.5	57,397	7.3	16.7
Middle	230	11.8	25.4	75,517	9.6	23.9
Upper	909	46.8	36.4	448,363	57.0	45.6
Unknown	475	24.5	10.5	180,619	23.0	11.1
Total	1,941	100.0	100.0	786,988	100.0	100.0
Refinance Loans						
Low	182	7.7	5.7	26,676	3.3	3.3
Moderate	356	15.2	17.1	73,254	9.2	13.2
Middle	365	15.5	22.9	93,273	11.7	21.5
Upper	1,076	45.8	37.2	469,133	58.7	43.8
Unknown	370	15.8	17.2	137,393	17.2	18.2
Total	2,349	100.0	100.0	799,729	100.0	100.0
Home Improvement Loans						
Low	53	5.8	5.6	3,309	3.6	4.2
Moderate	134	14.6	14.6	8,088	8.8	11.0
Middle	154	16.8	22.6	12,535	13.6	19.4
Upper	494	53.8	53.2	53,853	58.5	58.4
Unknown	83	9.0	4.0	14,195	15.4	7.0
Total	918	100.0	100.0	91,980	100.0	100.0
Total Home Mortgage Loans						
Low	394	6.9	5.5	58,818	3.4	3.2
Moderate	785	13.7	18.2	144,459	8.3	14.1
Middle	849	14.8	23.3	189,302	10.9	22.0
Upper	2,738	47.8	37.5	1,010,251	58.1	44.5
Unknown	957	16.7	15.5	336,552	19.3	16.2
Total	5,723	100.0	100.0	1,739,382	100.0	100.0
Source:	2020 FFIEC Census Data					
	2011-2015 U.S. Census Bureau: American Community Survey					
Note:	Percentages may not total 100.0 percent due to rounding.					
	Multifamily loans are not included in the borrower distribution analysis.					

Table 19 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
Other Purpose LOC							
Low	16	4.7	5.8	1,437	3.6	3.8	21.3
Moderate	32	9.3	14.5	1,806	4.5	9.8	17.5
Middle	63	18.3	23.0	5,459	13.5	17.4	20.4
Upper	210	61.0	55.0	28,766	71.3	67.1	40.7
Unknown	23	6.7	1.7	2,880	7.1	2.0	0.0
Total	344	100.0	100.0	40,348	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	33	19.3	8.6	2,304	11.3	3.8	21.3
Moderate	46	26.9	17.8	3,914	19.2	8.9	17.5
Middle	37	21.6	20.4	2,518	12.4	11.9	20.4
Upper	49	28.7	45.7	10,136	49.8	63.4	40.7
Unknown	6	3.5	7.5	1,465	7.2	12.0	0.0
Total	171	100.0	100.0	20,337	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.0	21.3
Moderate	0	0.0	0.1	0	0.0	0.0	17.5
Middle	0	0.0	0.0	0	0.0	0.0	20.4
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	99.7	0	0.0	99.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data</i>							
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Small Business Lending

The borrower distribution of small business lending over the three-year evaluation period is good. The bank originated a high number of PPP loans in 2020 where revenue information was not required to be obtained, resulting in a large percentage of revenue not known. When removing the unknown revenue information, the bank's percentage of lending by number was 79.2 percent by number and 62.8 percent by dollar. In addition, 93.4 percent of the loans were for \$250,000 or less, which are generally amounts required by smaller businesses.

The distribution of small business lending in 2019 and 2018 was generally consistent with 2020 performance.

Table 20 Distribution of 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Denver-Boulder-Greeley CSA						
	Bank And Aggregate Loans				Total Businesses %	
	Bank		Agg	Bank		
	#	#%	#%	\$ (000)	\$%	\$%
By Revenue						
\$1 Million or Less	1,265	11.2	40.6	113,661	14.7	22.6
Over \$1 Million	332	2.9		67,302	8.7	
Revenue Unknown	9,734	85.9		592,638	76.6	
Total	11,331	100.0		773,601	100.0	
By Loan Size						
\$100,000 or Less	9,430	83.2	87.7	223,580	28.9	32.6
\$100,001 - \$250,000	1,157	10.2	6.9	187,368	24.2	19.4
\$250,001 - \$1 Million	744	6.6	5.4	362,653	46.9	48.0
Total	11,331	100.0	100.0	773,601	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	1,043	82.5		8,930	7.9	
\$100,001 - \$250,000	66	5.2		12,497	11.0	
\$250,001 - \$1 Million	156	12.3		92,234	81.1	
Total	1,265	100.0		113,661	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.</i>						

Community Development Lending

The bank is a leader in making CD loans. As shown in Table 21, the bank originated 273 CD loans totaling \$752.2MM, or 62.5 percent by number and 67.2 percent dollar volume of all CD loans originated bank-wide. The bank's leadership position served to bolster the bank's lending test performance in the AA. A majority of the bank's CD loans in this AA are responsive to affordable housing needs, followed by lending to support area revitalization and stabilization efforts. Examples of CD loans include:

- The bank originated a loan for \$16.7MM as part of a LIHTC project to build 102 apartments that will provide affordable housing to individuals and families making less than 60.0 percent of the Denver MSA's MFI. The loan will also fund the development of restaurants and retail shops that will provide employment to LMI individuals.
- The bank originated a \$38.6MM loan in a moderate-income tract and an enterprise zone in Boulder County that will utilize tax incentives to construct 12 buildings that will include 207 apartment units, common areas for tenants, and retail space that will aid in revitalizing and stabilizing this area through job creation.
- The bank originated a loan for \$16.7MM in the Denver area that will be used to construct 132 affordable condominium units restricted to buyers at or below 80.0 percent of the area MFI. The project is also a transit-oriented development site located directly across the street from a train station on one of the Rural Transportation District's major train lines.

**TABLE 21
COMMUNITY DEVELOPMENT LOANS
DENVER-BOULDER-GREELEY CSA AA**

Community Development Purpose	#	\$(000's)
Affordable Housing	122	392,122
Community Services	64	25,390
Economic Development	41	62,371
Revitalization and Stabilization	46	272,284
TOTAL LOANS	273	752,167

INVESTMENT TEST

The bank's performance under the investment test in the Denver-Boulder-Greeley CSA AA is excellent. Statewide investments totaling \$121.1MM and 87 donations totaling \$1.5MM to state-wide charitable organizations that benefited multiple AAs are reflected only in the state totals and not at the AA level. However, specific activities benefitting the Denver-Boulder-Greeley CSA AA are considered in the performance analysis. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA. Similar to other markets, the bank utilizes a variety of investment instruments in this AA that support a number of CD activities. Table 22 illustrates the breakdown of the bank's investments and donations in greater detail. The following are specific examples of responsive investments to address AA needs:

- The bank purchased a \$10.5MM mortgage-backed security issued by Fannie Mae to finance a HUD Section 8 multi-family housing complex collateralized by 61 units. All units are restricted to occupants with incomes below 50.0 percent of the area's median income set by HUD.
- The bank purchased a \$23.2MM bond that will serve to repay a Denver school district's annual lease agreement, fund the cost of constructing or acquiring the district's capital improvements, and pay the issuance cost. Approximately 64.0 percent of the district's students qualify for the free and reduced lunch program.
- The bank purchased a \$5.8MM LIHTC investment that will support area affordable housing by financing the construction of 26 new housing units for families and individuals earning between 20 percent and 80 percent of the area median income.

TABLE 22 INVESTMENTS, GRANTS, AND DONATIONS DENVER-BOULDER-GREELEY CSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	4	1,281	4	20,843	47	459	55	22,583
Community Services	8	39,494	2	25,552	323	1,401	333	66,447
Economic Development	0	0	0	0	4	73	4	73
Revitalization and Stabilization	4	11,070	0	0	3	14	7	11,084
TOTAL	16	51,845	6	46,395	377	1,947	399	100,187

¹ Book Value of Investment
² Original Market Value of Investment

The bank's level of philanthropic activity was consistent with its overall good level of investment activity in the AA, which consisted of 377 donations totaling \$1.9MM. Examples of responsive donations in the AA include:

- The bank made a \$250.0M grant to an affordable housing organization to support first time homeowners by offering down payment assistance to prospective new homeowners in Denver.
- The bank made a \$42.0M donation to a youth-enrichment program that provides sports and educational programs to approximately 15.0M girls and boys from LMI families each year.
- The bank made two annual donations totaling \$80.0M to a faith-based charitable organization that provides support and services to individuals in need through various programs that focus on homelessness, healthcare, and educational assistance, which benefit the most vulnerable populations within the community.

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 68 full-service offices in the AA, including its headquarters in Lakewood. The distribution of branches within the Colorado AAs is generally proportional to the percent of census tracts by income level, with several the bank's branches located in middle- and upper-income geographies located in close proximity to LMI tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank opened one branch in an upper-income tract and closed nine branches, including two in moderate-, four in middle-, and three in

upper-income census tracts. The closing of the two branch locations in moderate-income tracts will have a limited impact to bank customers and LMI individuals, as the bank has nearby locations within a five-mile radius that will be able to effectively serve nearby LMI geographies and LMI residents.

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 range from 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. The bank offers drive-through facilities at 68 of its AA branches and hours mirror lobby hours.

TABLE 23 RETAIL AND COMMUNITY DEVELOPMENT SERVICES DENVER-BOULDER-GREELEY CSA AA											
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)				
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk
	2.9	16.2	41.2	39.7	0.0	100.0	8.2	23.5	34.1	33.0	1.2
Changes in Branch Location	Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)				
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk
	3.0	16.4	41.8	38.8	0.0	100.0	8.2	23.5	34.1	33.0	1.2
Community Development Services	Number of Branches (#)						Net Change in Branch Locations (#)				
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	68	1		9		0	(2)	(4)	(2)	0	(8)
Community Development Services	Affordable Housing	Community Services		Economic Development	Revitalization & Stabilization		Total Services		Total Organizations		
	88	337		13	14		452		168		

¹ Based on 2020 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 noted in Table 23, the bank provided a total of 452 services to 168 organizations in the area. The services were primarily directed to community service organizations that benefit LMI individuals and families. A significant number of service activities continued throughout 2020 during the pandemic in response to the needs of various organizations during this crisis. Examples of CD services performed by bank employees include:

- One bank representative served as the board chairperson for an organization that ensures employers have access to qualified, work-ready employees, to aid in finding sustainable, life-long careers, and promote economic vitality for individuals in two of the AA counties.
- Two bank representatives served on an organization's board that assists adult survivors of childhood sexual abuse by providing support services, advocacy, and education to clients who primarily fall in LMI brackets.
- Three bank representatives served as financial education instructors for an organization that provides English language, computer, general educational development, financial literacy, and college-level classes for the Hispanic community.

OTHER COLORADO METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Reviews)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE COLORADO METROPOLITAN AREAS

FORT COLLINS MSA AA

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

- The AA is comprised of 73 total census tracts, including 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tract. The AA census tract composition has not changed since the previous evaluation.
- Based on 2015 American Community Survey (ACS) data, the population was 318,227, which reflects a 6.2 percent increase from the 2010 ACS data.
- The bank operates five full-service branches in the AA, with three located in moderate-income census tracts and two in upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held 8.5 percent market share of deposits in the AA, ranking 5th of 25 financial institutions operating from 94 offices in the AA.
- The limited-scope analysis did not rely on any current or previously conducted interviews with members of the community.

COLORADO SPRINGS MSA AA

The bank's AA is comprised of the Colorado Springs, Colorado MSA, which includes Teller and El Paso Counties in their entireties (refer to Appendix C for an AA map).

- The AA is comprised of 136 total census tracts, including 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts. The unknown tracts include the Air Force Academy and a portion of the Fort Carson Military installation. The AA census tract composition has not changed since the previous evaluation.
- Based on 2015 ACS data, the population was 678,364, which reflects a 5.1 percent increase from the 2010 ACS data.
- The bank operates seven banking offices within the AA, including one in a low-, one in a moderate-, two in a middle-, and three in upper-income census tracts.
- As of the June 30, 2020 FDIC Deposit Market Share Report, the bank held a 7.2 percent market share of deposits in the AA, ranking 4th of 39 FDIC-insured financial institutions operating from 135 offices in the AA.
- The limited-scope analysis did not rely on any current or previously conducted interviews with members of the community.

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

The two Colorado AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Fort Collins MSA AA	consistent	below	consistent
Colorado Springs MSA AA	consistent	consistent	consistent

OTHER COLORADO NONMETROPOLITAN ASSESSMENT AREAS
(Limited-Scope Reviews)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE COLORADO NONMETROPOLITAN AREA

MOUNTAIN AA

The bank's Mountain AA is comprised of Eagle, Garfield, Grand, Lake, Pitkin, and Summit Counties in their entireties (refer to Appendix C for an AA map).

- The AA is comprised of 39 total census tracts, including 14 middle- and 25 upper-income census tracts. The AA composition has not changed since the previous evaluation
- Based on 2015 ACS data, the AA population was 177,785, which reflects a 1.1 percent increase from the 2010 ACS data.
- The bank operates 11 banking offices, with three located in middle-income census tracts and eight located in upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held 22.7 percent market share of deposits in the AA, ranking 2nd of 17 FDIC-insured financial institutions operating from 94 locations in the AA.
- The limited-scope analysis did not rely on any current or previously conducted interviews with members of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE COLORADO NONMETROPOLITAN AREA

The Colorado AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Mountain AA	consistent	below	consistent

**STATE OF ARIZONA/
PHOENIX METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

CRA RATING FOR ARIZONA:

The lending test is rated: **Outstanding**
The investment test is rated: **High Satisfactory**
The service test is rated: **Outstanding**
The service test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing of 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 Arizona 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, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Phoenix MSA AA, the bank's only delineated AA in the state of Arizona. The overall state rating was solely based on the bank's performance in this AA. Therefore, the statewide performance will be discussed concurrently with the bank's performance in the Phoenix MSA AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

The bank delineates one of its six AAs and operates 14 of its 109 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 residential and commercial real estate lending. Detailed descriptions of the bank's operations in the Phoenix MSA AA are provided in the analysis for that AA that follows.

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

The bank's AA is comprised of Maricopa and Pinal Counties in their entireties (refer to Appendix C for an AA map).

- The AA is comprised of 991 total census tracts, including 110 low-, 231 moderate-, 326 middle-, 311 upper-, and 13 unknown-income census tracts.
- The bank operates 14 of its 109 branches within the Phoenix MSA AA. The distribution of branch offices by tract income level includes one in a low-, one in a moderate-, 4 in middle-, and 8 offices in upper-income tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank has a 0.5 percent market share in the AA, ranking 15th of 59 FDIC-insured financial institutions operating from 772 locations in the AA.
- Two community contacts recently conducted as part of the CRA evaluations of other financial institution with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. One contact represented a neighborhood housing organization and the other was affiliated with the economic development department of a city located in the AA.

**TABLE 24
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Phoenix MSA AA	4,192,887	4,407,915	5.1
Maricopa County, AZ	3,817,117	4,018,143	5.3
Pinal County, AZ	375,770	389,772	3.7
Arizona	6,392,017	6,641,928	3.9

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

- As illustrated in Table 24, the AA population reflected growth that outpaced the overall state level between 2010 and 2015.
- The Phoenix MSA includes 66.4 percent of the state of Arizona's population, and Maricopa County contains 91.2 percent of the MSA's population.
- According to an interview with a community representative, Maricopa County is the fourth largest populated area in the United States, and the county is growing rather quickly due to an influx of in-migration.

**TABLE 25
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Phoenix MSA AA	70,137	63,686	(9.2)
Maricopa County, AZ	71,259	64,751	(9.1)
Pinal County, AZ	61,307	55,362	(9.7)
Arizona	65,163	59,480	(8.7)

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

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

- As noted in Table 25, the MFI in the AA was higher than the statewide figure, which was driven by the higher MFI in Maricopa County when compared to Pinal County.
- The percentage of AA families living below the poverty level, at 12.5 percent, is slightly below the statewide figure of 13.3 percent.

TABLE 26 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Phoenix MSA AA	78.4	56.1	44.3	65.5	44.3	24.3
Maricopa County, AZ	79.0	56.7	44.5	66.1	45.0	24.3
Pinal County, AZ	70.7	46.9	40.5	60.5	39.7	24.3
Arizona	77.7	55.3	44.3	62.1	42.3	24.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The AA's affordability ratio at 30.1 percent mirrored the statewide ratio at 30.0 percent.
- The low affordability of rents, specifically among low-income renters in Maricopa County, may hinder the ability of LMI individuals and families to afford home ownership absent special loan programs that offer down-payment assistance.
- A community contact affiliated with a municipal economic development department stated that affordable housing is a significant need in the community. The contact indicated that there is a large portion of LMI individuals employed in the hospitality and tourism industries who are unable to locate affordable housing close to their place of employment.

TABLE 27 UNEMPLOYMENT RATES					
Region	2016	2017	2018	2019	2020
Phoenix MSA AA	4.7	4.3	4.2	4.2	7.4
Maricopa County, AZ	4.7	4.2	4.1	4.2	7.4
Pinal County, AZ	5.6	5.1	5.0	5.0	7.5
Arizona	5.5	4.9	4.8	4.9	7.9

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment in the Phoenix AA trended lower than rates in the state of Arizona, although there were differences in rates among the two AA counties, with the exception of the upsurge in 2020 as a result of the pandemic.
- Top employers in Phoenix include State of Arizona, Wal-Mart Stores, Banner Health, City of Phoenix, Wells Fargo, and Bank of America.
- A community contact representing a community housing organization noted that micro-lending to area businesses is an important credit need that has been met by nonprofit organizations and CDFIs, while traditional financial institutions have not met this need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA / PHOENIX MSA AA

LENDING TEST

The bank's performance under the lending test in the state of Arizona is High Satisfactory. The Phoenix MSA AA lending test is good.

Lending Activity

The bank's lending activities in the state of Arizona reflect good responsiveness to AA credit needs. The evaluation of loans in the AA included 1,843 home mortgage and 926 small business loans originated during a three-year period between January 1, 2018 and December 31, 2020.

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

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA.

Home Mortgage Lending

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

The bank's home mortgage lending in 2019 and 2018 reflected penetration levels consistent with 2020 lending patterns. The bank's loan dispersion among geographies of different income levels revealed some gaps in all three years. However, as stated above, the Phoenix MSA is quite large and contains numerous census tracts. Lending patterns appeared to be concentrated near the bank's branch locations and thus, did not impact the overall conclusion.

Home Purchase Loans

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

The bank's home purchase lending in 2019 and 2018 reflected penetration levels that were consistent with that of the 2020 lending patterns. Furthermore, the bank's loan dispersion among geographies of

different income levels revealed some gaps in all three years, similar to the total home mortgage loans, but these gaps did not impact the overall conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2020 home refinance loans among low-income census tracts was above the aggregate lending data and comparable to the demographic figure. Lending in the moderate-income census tracts included penetration levels that were comparable to the aggregate lending data by number and below by dollar volume and the demographic figure.

The bank's home refinancing lending in 2019 reflected levels above that of 2020 performance, while 2018 performance was consistent with the level noted in 2020. Furthermore, the bank's loan dispersion among geographies of different income levels revealed some gaps in all three years, similar to home mortgage and purchase loans, but this did not impact the overall conclusion.

Home Improvement Loans

The geographic distribution of home improvement lending is adequate. The distribution of 2020 home improvement loans among low-income census tracts was comparable to aggregate lending data by number and above by dollar, while below the demographic figure. Lending in the moderate-income census tracts was comparable to aggregate lending data and below the demographic figure.

The bank's home improvement lending in 2019 and 2018 was consistent with 2020 lending patterns. Furthermore, the bank's loan dispersion among geographies of different income levels revealed significant gaps in all three years, based on the low number of home improvement loans dispersed among the AA's high number of census tracts. However, the absence of bank lending in these areas did not impact the overall conclusion.

Multifamily Loans

The geographic distribution of multifamily lending is adequate. The distribution of 2020 multifamily loans among low-income census tracts was comparable to aggregate lending data and above the demographic figure. Lending in the moderate-income census tracts was comparable to aggregate lending data and the demographic figure.

The bank's multifamily lending in 2019 and 2018 reflected penetration levels that were consistent with the bank's performance in 2020. Furthermore, the bank's loan dispersion among geographies of different income levels in all three years revealed significant gaps based on low lending levels, but they did not impact the overall conclusion.

Table 28
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	25	8.3	4.0	4,484	4.8	2.6	4.5
Moderate	68	22.4	16.1	11,640	12.4	11.7	19.6
Middle	89	29.4	42.3	16,704	17.8	36.7	37.1
Upper	121	39.9	36.8	60,771	64.9	48.1	38.7
Unknown	0	0.0	0.7	0	0.0	0.9	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	303	100.0	100.0	93,599	100.0	100.0	100.0
Refinance Loans							
Low	11	4.4	1.9	1,552	2.0	1.3	4.5
Moderate	26	10.4	11.4	3,554	4.5	8.3	19.6
Middle	88	35.1	36.5	18,246	23.2	31.2	37.1
Upper	124	49.4	49.6	55,233	70.1	58.6	38.7
Unknown	2	0.8	0.5	197	0.3	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	251	100.0	100.0	78,782	100.0	100.0	100.0
Home Improvement Loans							
Low	1	1.7	1.9	199	4.1	1.4	4.5
Moderate	7	12.1	10.9	435	9.0	8.4	19.6
Middle	16	27.6	33.6	877	18.2	27.8	37.1
Upper	34	58.6	53.2	3,311	68.7	62.2	38.7
Unknown	0	0.0	0.4	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	4,822	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	13	31.7	27.7	14,865	17.8	24.1	18.8
Moderate	11	26.8	35.3	13,304	16.0	23.7	31.0
Middle	8	19.5	23.5	24,456	29.3	31.6	31.0
Upper	9	22.0	12.6	30,737	36.9	20.4	18.7
Unknown	0	0.0	0.9	0	0.0	0.2	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	41	100.0	100.0	83,362	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	50	7.2	2.7	21,100	7.8	2.4	4.5
Moderate	119	17.0	13.1	29,632	11.0	10.0	19.6
Middle	219	31.3	38.4	62,610	23.3	33.1	37.1
Upper	308	44.1	45.3	155,247	57.7	53.8	38.7
Unknown	3	0.4	0.6	267	0.1	0.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	699	100.0	100.0	268,856	100.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table 29
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.5	0	0.0	0.8	4.5
Moderate	0	0.0	9.1	0	0.0	5.0	19.6
Middle	13	48.1	31.1	1,410	40.9	21.1	37.1
Upper	13	48.1	57.8	1,968	57.1	72.9	38.7
Unknown	1	3.7	0.4	70	2.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	3,448	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.1	0	0.0	0.9	4.5
Moderate	7	36.8	11.5	699	14.4	5.6	19.6
Middle	5	26.3	34.2	917	18.9	19.4	37.1
Upper	7	36.8	51.8	3,227	66.6	74.0	38.7
Unknown	0	0.0	0.3	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	4,843	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.3	0	0.0	3.4	4.5
Moderate	0	0.0	20.5	0	0.0	15.5	19.6
Middle	0	0.0	46.8	0	0.0	41.9	37.1
Upper	0	0.0	27.2	0	0.0	38.8	38.7
Unknown	0	0.0	0.2	0	0.0	0.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Small Business Lending

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

The distribution of small business loans in 2019 was above the performance in 2020, while 2018 reflected consistent performance to 2020. Furthermore, the bank's loan dispersion among geographies of different income levels in all three years revealed some gaps; however, the Phoenix MSA is quite large and contains numerous census tracts. Lending patterns appeared to be concentrated near the bank's branch locations and thus, did not impact the overall conclusion.

Table 30 Distribution of 2020 Small Business Lending By Income Level of Geography Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	42	6.4	6.6	6,149	10.2	10.1	6.5
Moderate	104	15.9	16.9	15,739	26.1	19.5	17.1
Middle	166	25.4	27.7	14,050	23.3	25.3	29.9
Upper	333	51.0	47.6	21,719	36.1	43.3	46.0
Unknown	8	1.2	0.6	2,535	4.2	1.3	0.5
Tract-Unknown	0	0.0	0.6	0	0.0	0.6	
Total	653	100.0	100.0	60,192	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

The bank's lending has an adequate penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. Similar to the borrower analysis of other AAs, lending levels were recalculated to account for the impact of investment properties by removing unknown borrower incomes. This adjustment allowed for a more meaningful analysis among the home mortgage lending products. As such, the penetration of 2020 loans to low-income borrowers was above the aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to both the aggregate lending data and the demographic figure.

The penetration levels of 2019 home mortgage lending were comparable to 2020 performance, while 2018 performance was below 2020 performance based on lower levels of lending to moderate-income borrowers.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The bank's performance was evaluated by factoring out the level of loans with unknown incomes from both bank lending and the aggregate data. The penetration of 2020 home purchase loans to low-income borrowers was comparable to the aggregate lending data, but below the demographic figure. In addition, bank lending to moderate-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The penetration level of 2019 home purchase lending was consistent with 2020 lending, while 2018 was below 2020 performance.

Home Refinance Loans

The borrower distribution of home refinance lending is good. Again, the bank's performance was evaluated by factoring out the level of loans with unknown incomes from both bank lending and the aggregate data. The penetration of 2020 home refinance loans to low-income borrowers was above the aggregate lending data and below the demographic figure. The lending to moderate-income borrowers was comparable to the aggregate lending data and comparable to the demographic figure.

The penetration levels of 2019 and 2018 home refinance lending were below that of 2020 performance.

Home Improvement Loans

The borrower distribution of home improvement lending is adequate. Due to the higher percentage of unknown incomes by the bank, the bank's performance was recalibrated and evaluated by removing the loans with unknown incomes from both bank lending and the aggregate data. The penetration of 2020 home improvement loans to low-income borrowers was comparable to the aggregate lending data by number and dollar volume and below the demographic figure. Similarly, the home improvement loans originated to moderate-income borrowers were also comparable to the aggregate data by number and dollar volume and below the demographic figure.

The penetration levels of 2019 home improvement lending were above that of 2020 performance, while the penetration levels in 2018 were below the 2020 lending patterns.

Table 31
Distribution of 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Phoenix MSA

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Home Purchase Loans						
Low	8	2.6	4.8	1,191	1.3	2.7
Moderate	24	7.9	20.8	5,032	5.4	15.3
Middle	16	5.3	21.9	3,125	3.3	19.7
Upper	89	29.4	38.5	34,859	37.2	48.8
Unknown	166	54.8	14.0	49,392	52.8	13.4
Total	303	100.0	100.0	93,599	100.0	100.0
Refinance Loans						
Low	26	10.4	4.7	2,553	3.2	2.6
Moderate	38	15.1	15.2	5,771	7.3	11.0
Middle	34	13.5	20.2	6,391	8.1	17.9
Upper	82	32.7	39.1	33,307	42.3	47.3
Unknown	71	28.3	20.8	30,760	39.0	21.3
Total	251	100.0	100.0	78,782	100.0	100.0
Home Improvement Loans						
Low	2	3.4	5.0	225	4.7	3.2
Moderate	5	8.6	14.6	225	4.7	11.7
Middle	8	13.8	22.2	778	16.1	19.4
Upper	34	58.6	54.7	2,421	50.2	60.2
Unknown	9	15.5	3.6	1,173	24.3	5.4
Total	58	100.0	100.0	4,822	100.0	100.0
Total Home Mortgage Loans						
Low	41	6.2	4.7	4,185	2.3	2.7
Moderate	76	11.6	16.8	11,795	6.4	12.4
Middle	63	9.6	20.5	10,712	5.8	18.3
Upper	224	34.0	39.0	75,247	40.6	47.8
Unknown	254	38.6	19.0	83,555	45.0	18.9
Total	658	100.0	100.0	185,494	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>						

Table 32 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	1	3.7	5.4	10	0.3	2.9	21.9
Moderate	5	18.5	13.4	283	8.2	8.3	17.3
Middle	2	7.4	18.3	113	3.3	12.0	19.5
Upper	12	44.4	59.1	2,137	62.0	72.0	41.3
Unknown	7	25.9	3.8	905	26.2	4.7	0.0
Total	27	100.0	100.0	3,448	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	4	21.1	7.6	206	4.3	3.7	21.9
Moderate	4	21.1	14.1	484	10.0	7.3	17.3
Middle	3	15.8	18.8	305	6.3	10.4	19.5
Upper	7	36.8	51.3	2,523	52.1	68.9	41.3
Unknown	1	5.3	8.2	1,325	27.4	9.6	0.0
Total	19	100.0	100.0	4,843	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.1	21.9
Moderate	0	0.0	0.2	0	0.0	0.3	17.3
Middle	0	0.0	0.3	0	0.0	0.3	19.5
Upper	0	0.0	0.2	0	0.0	0.2	41.3
Unknown	0	0.0	99.3	0	0.0	99.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 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 good. The bank originated a high number of PPP loans in 2020 where revenue information was not required to be obtained, resulting in a large percentage of revenue not known. When removing the unknown revenue information, the bank's percentage of lending by number was 72.4 percent by number and 70.4 percent by dollar. Further supporting bank performance was the number of loans in amounts of \$250,000 or less, at 89.9 percent, which serves as a proxy for lending to smaller business entities.

The distribution of small business lending in 2019 and 2018 was consistent with 2020 performance.

Table 33 Distribution of 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Phoenix MSA						
	Bank And Aggregate Loans					Total Businesses %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
By Revenue						
\$1 Million or Less	92	14.1	40.3	17,611	29.3	22.0 93.3
Over \$1 Million	35	5.4		7,399	12.3	
Revenue Unknown	526	80.6		35,182	58.4	
Total	653	100.0		60,192	100.0	
By Loan Size						
\$100,000 or Less	503	77.0	88.9	13,623	22.6	34.7
\$100,001 - \$250,000	84	12.9	6.3	15,278	25.4	19.5
\$250,001 - \$1 Million	66	10.1	4.7	31,291	52.0	45.7
Total	653	100.0	100.0	60,192	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	51	55.4		1,231	7.0	
\$100,001 - \$250,000	13	14.1		2,697	15.3	
\$250,001 - \$1 Million	28	30.4		13,683	77.7	
Total	92	100.0		17,611	100.0	
Source:	2020 FFIEC Census Data					
	2020 Dun & Bradstreet Data					
	2011-2015 U.S. Census Bureau: American Community Survey					
Note:	Percentages may not total 100.0 percent due to rounding.					

Community Development Lending

The bank is a leader in making CD loans in the Phoenix MSA AA, including 24 loans for \$63.5MM. These loans predominately supported affordable housing and economic development in the Phoenix MSA AA. Examples of CD loans include:

- Approximately \$1.8MM of a \$5.0MM loan supported affordable housing by financing an apartment complex in Scottsdale, Arizona with income restrictions on 10 of the 28 units as part of the HOME Investment Partnership Act through HUD.
- An economic development loan for \$1.6MM was used to purchase a business with gross annual revenues of less than \$1MM that will create jobs for 12 LMI employees.
- An economic development loan for \$2.9MM was made to construct a restaurant that will create jobs for approximately 150 LMI employees.

**TABLE 34
COMMUNITY DEVELOPMENT LOANS
PHOENIX MSA AA**

Community Development Purpose	#	\$(000's)
Affordable Housing	5	28,588
Community Services	3	410
Economic Development	10	25,844
Revitalization and Stabilization	6	8,625
TOTAL LOANS	24	63,467

INVESTMENT TEST

The bank's performance under the investment test in the state of Arizona is outstanding. The Phoenix MSA investment test is also excellent. The bank has an excellent level of qualified CD investments and grants and is occasionally in a leadership position in the Phoenix MSA AA. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA. The bank's investment instruments are comprised primarily of bonds issued by school districts with greater than 50 percent of the student population eligible for the free and reduced lunch program, as well as a bond issued by an affordable housing organization. Examples of investment activities include:

- The bank purchased a bond totaling \$2.9MM that was issued by a school district in Phoenix to finance the costs of renovating existing school facilities and purchasing pupil transportation vehicles for 21 schools with approximately 85 percent of students eligible for the free and reduced lunch program.
- The bank purchased a bond totaling \$2.4MM issued by a school district with approximately 65 percent of the students eligible for the free and reduced lunch program. The funds will be used to improve school and administrative facilities, acquire real property, purchase technology and equipment, purchase pupil transportation and maintenance vehicles, and pay issuance costs.

The bank also made \$1.8MM in philanthropic donations that were particularly responsive to area organizations that provide community services to LMI individuals and families, and to a lesser degree, donations supporting affordable housing initiatives. Examples of donation activities include:

- Similar to Colorado Gives Day that was discussed within the state of Colorado section, the bank also partners with the nonprofit Alliance of Arizona to sponsor Arizona Gives Day. During the evaluation period, the bank provided over \$153.0MM in matching funds and prizes to organizations that support LMI families and geographies and small businesses.
- Two donations totaling \$1.3MM were made to an organization that provides scholarship and tuition assistance to LMI families and disabled or displaced individuals.
- One donation for \$47.0M was made to an organization that provides home ownership counseling, financial access, and neighborhood development. This donation directly impacts approximately 20 LMI families in obtaining home ownership.

TABLE 35 INVESTMENTS, GRANTS, AND DONATIONS PHOENIX MSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	1,000	0	0	12	73	13	1,073
Community Services	11	16,028	2	5,236	50	1,717	63	22,981
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	1	586	0	0	0	0	1	586
TOTAL	13	17,614	2	5,236	62	1,790	77	24,640

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the state of Arizona is outstanding. The Phoenix MSA AA service test is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The Phoenix MSA AA contains 14 of the bank's 109 branches, including one branch in a low-, one in a moderate-, four in middle-, and eight in upper-income tracts. Although branch locations, including onsite full-service ATMs, were not proportional to the tracts by income level in LMI geographies, a few of the branches were located adjacent to, or are in close proximity to, LMI geographies. The bank's branching footprint is heavily concentrated in the most populous areas of the MSA and exclusively in Maricopa County.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open any new offices in this AA, but it did close one branch office located in a middle-income census tract since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operations and product offerings and services are generally consistent with those in the bank's other markets, which is discussed in the overall retail banking services section of this report.

TABLE 36
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
PHOENIX MSA AA

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (\$)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	7.1	7.1	28.6	57.1	0.0	100.0	11.1	23.3	32.9	31.4	1.3	100.0
Changes in Branch Location	Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	7.1	7.1	28.6	57.1	0.0	100.0	11.1	23.3	32.9	31.4	1.3	100.0
Community Development Services	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	14	0		1		0	0	(1)	0	0	(1)	
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization	Total Services		Total Organizations			
	10	32		0		3	45		18			

¹ Based on 2020 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, with bank representatives providing 45 services to 18 organizations in the AA. As noted in Table 36, CD services largely supported agencies that provide community services to LMI individuals and families, and to a lesser degree, organizations that support affordable housing. Examples of responsive CD services include:

- A bank representative served on the Finance Committee and as a board member for a nationally recognized housing organization that provides interest-free loans to LMI families to purchase affordable housing.
- A bank representative served as a board member and treasurer for a community-based nonprofit organization that assists impoverished, single mother households with obtaining a college education and financial independence.

**STATE OF CALIFORNIA/
COACHELLA VALLEY METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

CRA RATING FOR CALIFORNIA:

The lending test is rated: **Satisfactory**
The investment test is rated: **Low Satisfactory**
The service 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 (geographic distribution) is adequate.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes (borrower distribution) is adequate.
- The bank makes few, if any CD loans within its AA.

Investment Test

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

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing of 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 California 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, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Coachella Valley Metropolitan AA, the sole AA in the state; therefore, the statewide performance will be discussed concurrently with the bank's performance in the aforementioned AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA

The bank delineates one of its six AAs and operates 4 of its 109 branches in the state of California. 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 residential and commercial real estate lending. Detailed descriptions of the bank's operations in the Coachella Valley Metropolitan AA are provided in the analysis for that AA that follows.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CALIFORNIA / COACHELLA VALLEY METROPOLITAN AA

The bank's AA is comprised of 102 of the 453 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 only delineates a 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 an AA map).

- The AA is comprised of 102 census tracts, including 5 low-, 36 moderate-, 36 middle-, and 25 upper-income census tracts. The bank has not opened or closed any branches in the AA since the previous examination.
- The bank maintains four of its 109 branch offices in the AA, including two bank locations in middle- and two in upper-income census tracts.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 1.4 percent market share, ranking 14th of 29 FDIC-insured financial institutions operating from 295 locations in Riverside County.
- During the evaluation, a community contact was conducted with an executive director of an economic development agency. In addition, two community contacts from area housing organizations recently conducted as part of the CRA evaluations of other financial institutions with offices in the area were reviewed. The information obtained from the community contacts was used to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions.

**TABLE 37
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Coachella Valley Metropolitan AA	2,189,641	2,298,032	5.0
Riverside-San Bernardino-Ontario, CA MSA	4,224,851	4,392,801	4.0
California	37,253,956	38,421,464	3.1

Source: 2010 U.S. Census Bureau Decennial Census

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

Note: All data presented is at the county level, and some values may be different than expected for this AA, which includes a partial county.

- The 2015 population of the Coachella Valley AA is 439,653.
- The AA represents 19.1 percent of the Riverside County and 10.0 percent of the total MSA populations.
- The AA includes the resort cities of Palm Springs and Palm Desert, along with the communities of Desert Hot Springs, La Quinta, Rancho Mirage, Cathedral City, Indio, Indian Wells, and Coachella.

**TABLE 38
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Coachella Valley Metropolitan AA	70,550	63,737	(9.7)
Riverside-San Bernardino-Ontario, CA MSA	68,796	61,507	(10.6)
California	75,488	70,720	(6.3)

Source: 2006-2010 U.S. Census Bureau: American Community Survey

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

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

All data presented is at the county level, and some values may be different than expected for this AA, which includes a partial county.

- The AA has a higher percentage of families living below the poverty level, at 16.2 percent, compared to that of the MSA and the state, at 14.3 percent and 12.2 percent, respectively.

**TABLE 39
HOUSING COST BURDEN**

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Coachella Valley Metropolitan AA	84.0	71.3	55.1	71.3	57.3	35.8
Riverside-San Bernardino-Ontario, CA MSA	84.1	69.2	55.0	70.0	56.5	34.9
California	82.0	56.7	51.9	67.8	53.1	33.6

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

Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

Note: All data presented is at the county level, and some values may be different than expected for this AA, which includes a partial county.

- The percentage of owner-occupied units in the AA was 44.6 percent, which is below the MSA and state at 53.9 percent and 49.9 percent, respectively.
- The percentage of vacant units in the AA, at 29.1 percent, was more than double the entire MSA, at 13.7 percent, which is indicative of the high volume of vacation properties and secondary homes along with a high population of retirees who reside in the Coachella Valley area on a seasonal basis.
- The housing affordability ratio in the AA was 19.7 percent, which was below the MSA ratio of 22.4 percent.
- The lower affordability rates and higher rents in relation to income may hinder the ability of LMI individuals and families to afford home ownership absent special loan programs offering down-payment assistance.
- A community contact with a local housing organization stated that housing prices have increased, which have impacted the rental market in the area. A second contact affiliated with a different housing organization discussed the need for more involvement by financial institutions in affordable housing developments.

**TABLE 40
UNEMPLOYMENT RATES**

Region	2016	2017	2018	2019	2020
Coachella Valley Metropolitan AA	6.1	5.3	4.5	4.2	9.9
Riverside-San Bernardino-Ontario, CA MSA	6.0	5.1	4.3	4.1	9.7
California	5.5	4.8	4.3	4.2	10.1

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

- The primary industries in the AA include tourism and agriculture. Tourism is the area's largest employer and the primary contributor to the local economy. Agriculture is the second largest contributor to the local economy, and the Coachella Valley supplies over 50.0 percent of the county's fruits and vegetables and produces nearly \$1B in agricultural products annually. Healthcare ranks as the second largest employer in the Coachella Valley and is a growing contributor to the local economy.
- A community contact indicated that between 30.0 percent and 35.0 percent of small businesses in the AA had to permanently close as a result of the pandemic.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA / COACHELLA VALLEY METROPOLITAN AA

LENDING TEST

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

Lending Activity

The bank's lending activities in the state of California reflect adequate responsiveness to AA credit needs. The evaluation of loans in the AA included 350 home mortgage and 478 small business loans originated during a three-year period between January 1, 2018 and December 31, 2020.

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

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. Home improvement and multifamily loans were not evaluated based on lending levels too low to render a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate.

The distribution of 2020 home mortgage loans in low-income census tracts is comparable to the aggregate lending data and below the percentage of owner-occupied units in these tracts (demographic figure). The penetration of home mortgage loans in moderate-income tracts was comparable to the aggregate lending data by number but was below by dollar volume and below the demographic figure.

The bank's home mortgage lending in 2019 reflected penetration levels below that of 2020 lending, with a distribution of loans generally below the aggregate lending data and demographic figures. The 2018 home mortgage lending was consistent with 2020 lending. The bank's loan dispersion among geographies of different income levels in all three years showed some gaps based on low lending volumes overall, but it did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2020 home purchase loans in low-income census tracts was comparable to the aggregate lending data and below the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data by number and comparable by dollar volume and to the demographic figure.

The bank's home purchase lending in 2019 was below 2020 lending patterns while the 2018 lending was consistent with 2020 performance. The bank's loan dispersion among geographies of different income levels in all three years revealed some gaps, although the overall conclusion was not impacted.

Home Refinance Loans

The geographic distribution of home refinance lending is poor. The distribution of 2020 home refinance loans in low-income census tracts was comparable to the aggregate lending data and below the demographic figure. Lending in moderate-income census tracts was below the aggregate lending data and the demographic figure and was given more weight in determining the overall performance for home refinance loans.

The bank's home refinance lending in 2018 and 2019 reflected penetration levels that were consistent with the bank's performance in 2020. The bank's loan dispersion among geographies of different income levels in all three years revealed significant gaps given the low volumes of loans in LMI tracts.

Table 41
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	1.7	0	0.0	1.1	4.0
Moderate	19	33.3	23.5	2,909	14.2	19.2	29.5
Middle	18	31.6	37.4	4,164	20.3	34.9	33.6
Upper	20	35.1	37.3	13,419	65.5	44.8	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	20,492	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.7	0	0.0	1.1	4.0
Moderate	6	9.4	19.2	1,088	5.7	16.0	29.5
Middle	22	34.4	37.0	4,754	24.8	34.6	33.6
Upper	36	56.3	42.1	13,302	69.5	48.4	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	19,144	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.8	0	0.0	1.1	4.0
Moderate	1	7.7	20.4	75	3.1	14.6	29.5
Middle	3	23.1	33.0	283	11.8	28.7	33.6
Upper	9	69.2	44.8	2,033	85.0	55.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	2,391	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	5.9	0	0.0	9.8	9.1
Moderate	1	33.3	55.9	207	6.6	53.5	38.1
Middle	2	66.7	29.4	2,945	93.4	20.1	34.0
Upper	0	0.0	8.8	0	0.0	16.6	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	3,152	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.8	0	0.0	1.3	4.0
Moderate	27	18.6	21.0	4,279	8.8	18.2	29.5
Middle	47	32.4	37.0	14,186	29.2	34.2	33.6
Upper	71	49.0	40.1	30,124	62.0	46.4	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	145	100.0	100.0	48,589	100.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table 42
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	0	0.0	0.5	0	0.0	0.1
Moderate	0	0.0	16.7	0	0.0	9.7
Middle	1	16.7	30.8	40	6.1	21.2
Upper	5	83.3	52.0	620	93.9	69.0
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	6	100.0	100.0	660	100.0	100.0
Other Purpose Closed/Exempt						
Low	0	0.0	1.5	0	0.0	0.1
Moderate	0	0.0	14.7	0	0.0	8.1
Middle	1	50.0	36.6	2,000	72.7	31.4
Upper	1	50.0	47.3	750	27.3	60.4
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	2	100.0	100.0	2,750	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	5.9	0	0.0	3.5
Moderate	0	0.0	35.0	0	0.0	25.0
Middle	0	0.0	36.9	0	0.0	35.9
Upper	0	0.0	22.2	0	0.0	35.5
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>						

Small Business Lending

The geographic distribution of small business lending during the evaluation period is poor.

The distribution of 2020 small business loans in low-income census tracts was comparable to the aggregate lending data and the demographic figure. Lending in moderate-income census tracts was below both the aggregate lending data and the demographic figure.

The distribution of small business loans in 2019 was above that of 2020 lending, while 2018 was consistent with 2020 performance. The bank's dispersion among geographies of different income levels revealed gaps in moderate-income census tracts in all three years that contributed to the overall poor conclusion.

Table 43 Distribution of 2020 Small Business Lending By Income Level of Geography Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	4	1.1	3.1	1,083	3.0	2.8	2.5
Moderate	48	13.3	32.0	6,534	18.4	33.6	32.9
Middle	133	36.7	30.2	11,128	31.3	28.3	29.9
Upper	177	48.9	34.7	16,769	47.2	35.3	34.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	362	100.0	100.0	35,514	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

The bank's lending has adequate penetration among individuals of different income levels and businesses of different sizes. Home improvement and multifamily loans were not evaluated based on lending levels too low to render a meaningful analysis.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. Once again, to ensure a more meaningful analysis, mortgage lending was recalibrated to remove the percentage of loans with unknown incomes and consider the impact of higher investor lending by the bank. As such, the penetration of 2020 loans to low-income borrowers was above the aggregate lending data, but below the demographic figure. However, lending to moderate-income borrowers was above both the aggregate lending data and the demographic figure.

The penetration levels of 2018 and 2019 home mortgage lending were below that of 2020 performance; therefore, the overall performance was adequate.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The penetration of 2020 loans to low-income borrowers was above the aggregate lending data, but below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data, as well as the demographic figure.

The penetration levels of 2019 loans were below the performance of 2020 lending, while 2018 performance was consistent with lending in 2020.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The penetration of 2020 loans to low-income borrowers was above the aggregate lending data, but below the demographic figure. Lending to moderate-income borrowers was above aggregate lending data and the demographic figure.

The penetration levels of 2019 and 2018 home refinance lending were below that of 2020 performance; therefore, the overall performance was adequate.

Table 44
Distribution of 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Coachella Valley Metropolitan

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	3.5	1.8	145	0.7	0.9	26.9
Moderate	5	8.8	9.5	811	4.0	5.6	19.4
Middle	1	1.8	17.2	330	1.6	12.4	17.5
Upper	10	17.5	59.4	6,824	33.3	69.0	36.1
Unknown	39	68.4	12.1	12,382	60.4	12.1	0.0
Total	57	100.0	100.0	20,492	100.0	100.0	100.0
Refinance Loans							
Low	3	4.7	2.6	424	2.2	1.5	26.9
Moderate	11	17.2	10.4	1,613	8.4	6.7	19.4
Middle	3	4.7	15.7	610	3.2	12.3	17.5
Upper	25	39.1	50.2	8,085	42.2	57.1	36.1
Unknown	22	34.4	21.1	8,412	43.9	22.3	0.0
Total	64	100.0	100.0	19,144	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.6	0	0.0	2.2	26.9
Moderate	0	0.0	12.4	0	0.0	7.8	19.4
Middle	1	7.7	16.5	50	2.1	12.6	17.5
Upper	6	46.2	62.9	1,908	79.8	66.2	36.1
Unknown	6	46.2	4.6	433	18.1	11.1	0.0
Total	13	100.0	100.0	2,391	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	3.5	2.3	569	1.3	1.3	26.9
Moderate	17	12.0	9.9	4,424	9.7	6.2	19.4
Middle	5	3.5	16.0	990	2.2	12.1	17.5
Upper	45	31.7	53.2	17,277	38.0	62.0	36.1
Unknown	70	49.3	18.6	22,177	48.8	18.6	0.0
Total	142	100.0	100.0	45,437	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table 45 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	7.2	0	0.0	5.6	26.9
Moderate	0	0.0	13.1	0	0.0	6.7	19.4
Middle	0	0.0	11.8	0	0.0	4.9	17.5
Upper	4	66.7	64.7	460	69.7	80.6	36.1
Unknown	2	33.3	3.2	200	30.3	2.2	0.0
Total	6	100.0	100.0	660	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.5	0	0.0	1.8	26.9
Moderate	1	50.0	8.4	2,000	72.7	4.7	19.4
Middle	0	0.0	11.7	0	0.0	2.1	17.5
Upper	0	0.0	60.8	0	0.0	74.1	36.1
Unknown	1	50.0	13.6	750	27.3	17.3	0.0
Total	2	100.0	100.0	2,750	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	26.9
Moderate	0	0.0	0.4	0	0.0	0.4	19.4
Middle	0	0.0	0.0	0	0.0	0.0	17.5
Upper	0	0.0	0.6	0	0.0	1.6	36.1
Unknown	0	0.0	98.9	0	0.0	98.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

*Source: 2020 FFIEC Census Data
2011-2015 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 over the three-year evaluation period is good. As indicated previously, the bank originated a large volume of PPP loans across all its markets in 2020 and revenue information was not required to obtain these loans. When removing this data, the bank's percentage of lending to small businesses was 62.5 percent by number and 37.5 percent by dollar, but still below the percentage of small businesses in the AA. However, the number of loans in amounts of \$250,000 or less was at 87.8 percent, which serves as a proxy for lending to smaller business entities.

The distribution of 2019 and 2018 small business lending was consistent with 2020 performance.

Table 46 Distribution of 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Coachella Valley Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
By Revenue							
\$1 Million or Less	25	6.9	39.7	2,270	6.4	24.6	93.9
Over \$1 Million	15	4.1		3,776	10.6		5.6
Revenue Unknown	322	89.0		29,468	83.0		0.5
Total	362	100.0		35,514	100.0		100.0
By Loan Size							
\$100,000 or Less	267	73.8	91.2	8,212	23.1	41.1	
\$100,001 - \$250,000	58	16.0	5.5	9,010	25.4	20.0	
\$250,001 - \$1 Million	37	10.2	3.3	18,292	51.5	38.9	
Total	362	100.0	100.0	35,514	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	20	80.0		155	6.8		
\$100,001 - \$250,000	2	8.0		454	20.0		
\$250,001 - \$1 Million	3	12.0		1,661	73.2		
Total	25	100.0		2,270	100.0		
Source:	2020 FFIEC Census Data						
	2020 Dun & Bradstreet Data						
	2011-2015 U.S. Census Bureau: American Community Survey						
Note:	Percentages may not total 100.0 percent due to rounding.						

Community Development Lending

The bank makes few, if any, CD loans in its Coachella Valley Metropolitan AA. The bank originated two loans totaling \$2.4MM under the CD purposes of affordable housing and community services. As a percentage of bank-wide CD lending, the bank had less than one percent of its loans by number and dollar within the Coachella Valley Metropolitan AA.

TABLE 47 COMMUNITY DEVELOPMENT LOANS COACHELLA VALLEY METROPOLITAN AA		
Community Development Purpose	#	\$(000's)
Affordable Housing	1	2,000
Community Services	1	400
Economic Development	0	0
Revitalization and Stabilization	0	0
TOTAL LOANS	2	2,400

INVESTMENT TEST

The bank's performance under the investment test in the state of California is outstanding. The Coachella Valley Metropolitan AA investment test is excellent. The bank has an excellent level of qualified CD investments and grants in the Coachella Valley Metropolitan AA. The bank is occasionally in a leadership position, makes occasional use of innovative and/or complex investments, and exhibits good responsiveness to credit and CD needs of its AA.

During the evaluation period, the bank made 10 investments for \$19.1MM. Five of the 10 investments totaling \$6.7MM were prior-period investments, and five bonds were purchased during the review period for \$12.4MM that had a direct impact on the AA. The five bonds purchased during the review period were issued to finance the improvement of school facilities within the district that had a majority of students eligible for the free and reduced lunch program or were considered Title I schools. The prior period investments were comprised of school bonds and bonds to address conditions of physical and economic blight as part of redevelopment projects or local government initiatives. The bank's level of donation activity also exhibits good responsiveness to credit and community needs. Some examples of notable investments and donations include:

- The bank provided a total of \$52.5M in donations to a nationally recognized nonprofit housing organization whose mission is to provide affordable housing for low-income individuals and families.
- The bank provided a total of \$7.9M in donations to a notable organization that offers a wide variety of educational and athletic programs to local children and teens, primarily from low-income families.

TABLE 48
INVESTMENTS, GRANTS, AND DONATIONS
COACHELLA VALLEY METROPOLITAN AA

Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	3	5,114	0	0	4	65	7	5,179
Community Services	2	1,563	5	12,419	14	33	21	14,015
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
TOTAL	5	6,677	5	12,419	18	98	28	19,194

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

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

Retail Banking Services

Branch offices and delivery systems are reasonably accessible to the bank's geographies and to individuals of different income levels in the Coachella Valley Metropolitan AA. The bank operates 4 of its 109 banking offices in the AA, including two offices in middle- and two in upper-income tracts. Although the bank does not operate a branch in LMI tracts, two of its full-service branches (Indio and Palm Desert) either border or are located in close proximity to LMI tracts. All branches in the AA are full-service facilities with on-site, full-service ATMs, and three of the four locations offer drive-through 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. The bank has not opened or closed any branch offices in this AA since the prior examination.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's hours of operation and product offerings are generally consistent with that of the institution as a whole, which is described in the overall retail banking services section of this report.

**TABLE 49
RETAIL AND COMMUNITY DEVELOPMENT SERVICES
COACHELLA VALLEY METROPOLITAN AA**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	50.0	50.0	0.0	100.0	4.9	35.3	35.3	24.5	0.0	100.0
Location of Full-Service ATMs by Tract (%)						Percent of Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	50.0	50.0	0.0	100.0	4.9	35.3	35.3	24.5	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	4	0		0		0	0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization	Total Services		Total Organizations			
	3	25		0		0	28		10			

¹ Based on 2020 FFIEC census tract definitions.

(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

Community Development Services

The bank is a leader in providing CD services in the Coachella Valley Metropolitan AA. As illustrated in Table 49, CD services largely supported agencies that provide community services to LMI individuals and families and to a lesser degree, organizations that support affordable housing. Examples of CD services include:

- A bank representative serves as a board member for an organization that focuses on the homeless community, as well as need-based families, throughout the Coachella Valley.
- A bank representative is a board member for an organization that provides mentoring and education to youth located in LMI areas and from LMI homes. The bank representative served on various committees within the organization in addition to serving on its board.
- A bank representative served on the board for an organization that focuses on home ownership for low-income families. The bank representative reviewed loan applications and documentation, as well as serving on the organization's finance and audit committees.

APPENDIX A

SCOPE OF EXAMINATION			
<u>FINANCIAL INSTITUTION</u>	<u>PRODUCTS/SERVICES REVIEWED</u>		
FirstBank Lakewood, Colorado	<ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 		
TIME PERIODS REVIEWED			
<u>HMDA LAR and CRA SB Loans:</u>	January 1, 2018 to December 31, 2020		
<u>Community Development Activities:</u>	January 1, 2019 to June 30, 2021		
LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
FirstBank Holding Company	Holding Company	None	
1031 Corporation	Sub of Bank	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 MSA 19740 (Denver-Aurora-Lakewood) MSA 14500 (Boulder) MSA 24540 (Greeley) MSA 17820 (Colorado Springs) MSA 22660 (Fort Collins) MSA 99999 (Mountain)	Full Review Limited Review Limited Review Limited Review	None None None None	3 prior 1 new 1 prior
<u>Arizona</u> MSA 38060 (Phoenix)	Full Review	None	2 prior
<u>California</u> MSA 40140 (Coachella Valley)	Full Review	None	1 new, 2 prior

APPENDIX B

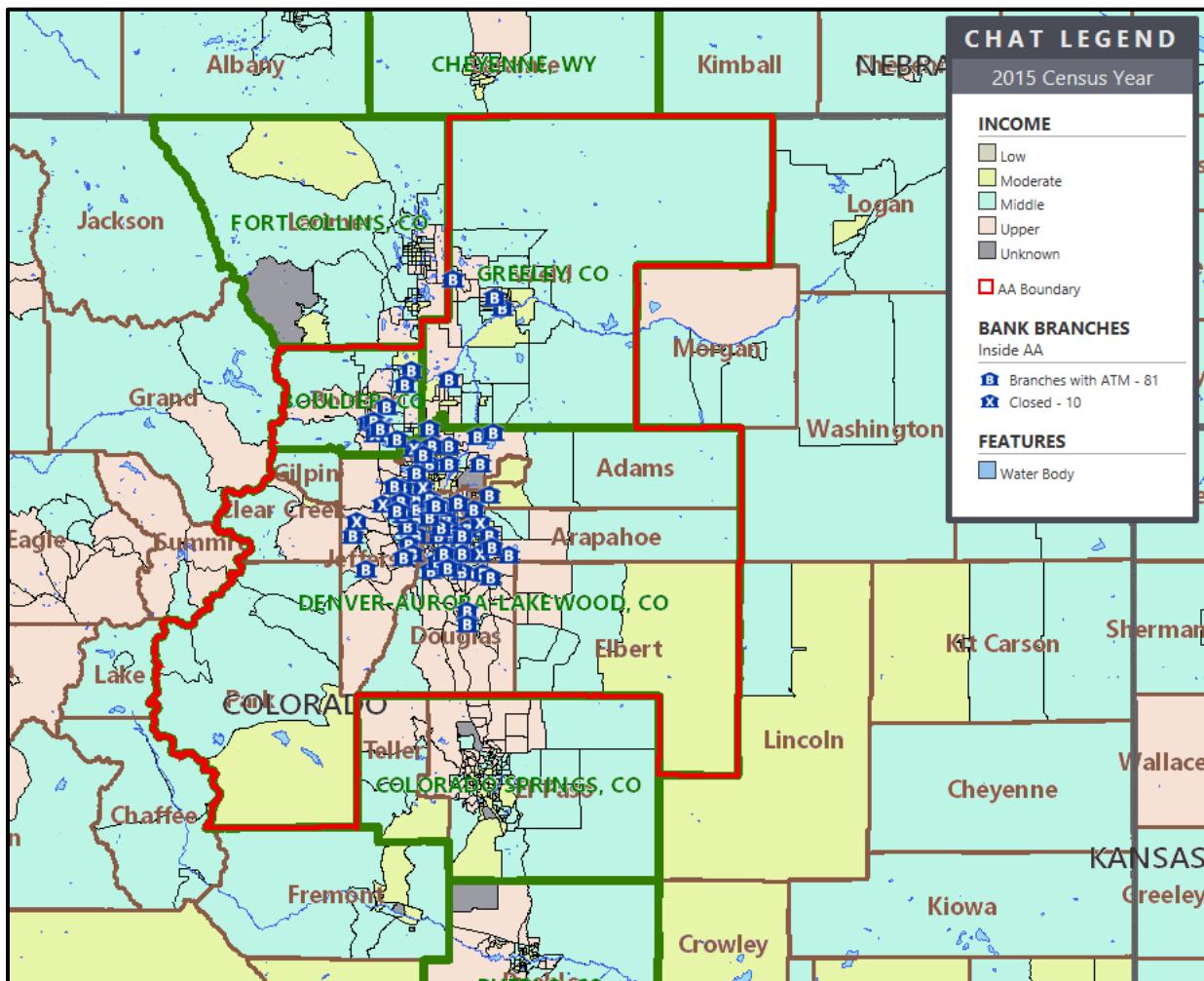
SUMMARY OF STATE RATINGS

STATE NAME	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Colorado	High Satisfactory	Outstanding	Outstanding	Outstanding
Arizona	High Satisfactory	Outstanding	Outstanding	Outstanding
California	Low Satisfactory	Outstanding	Outstanding	Satisfactory

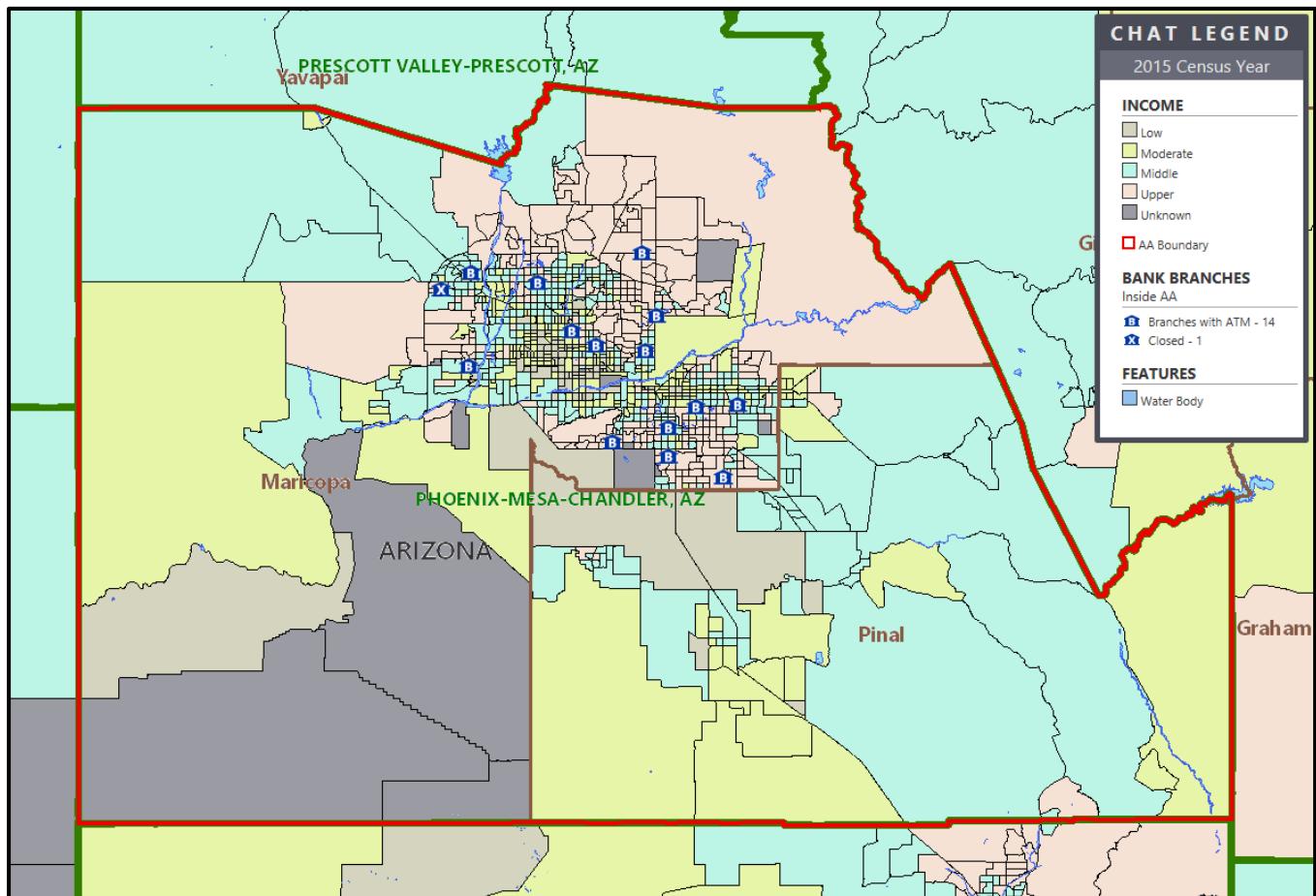
APPENDIX C

MAPS OF THE ASSESSMENT AREAS

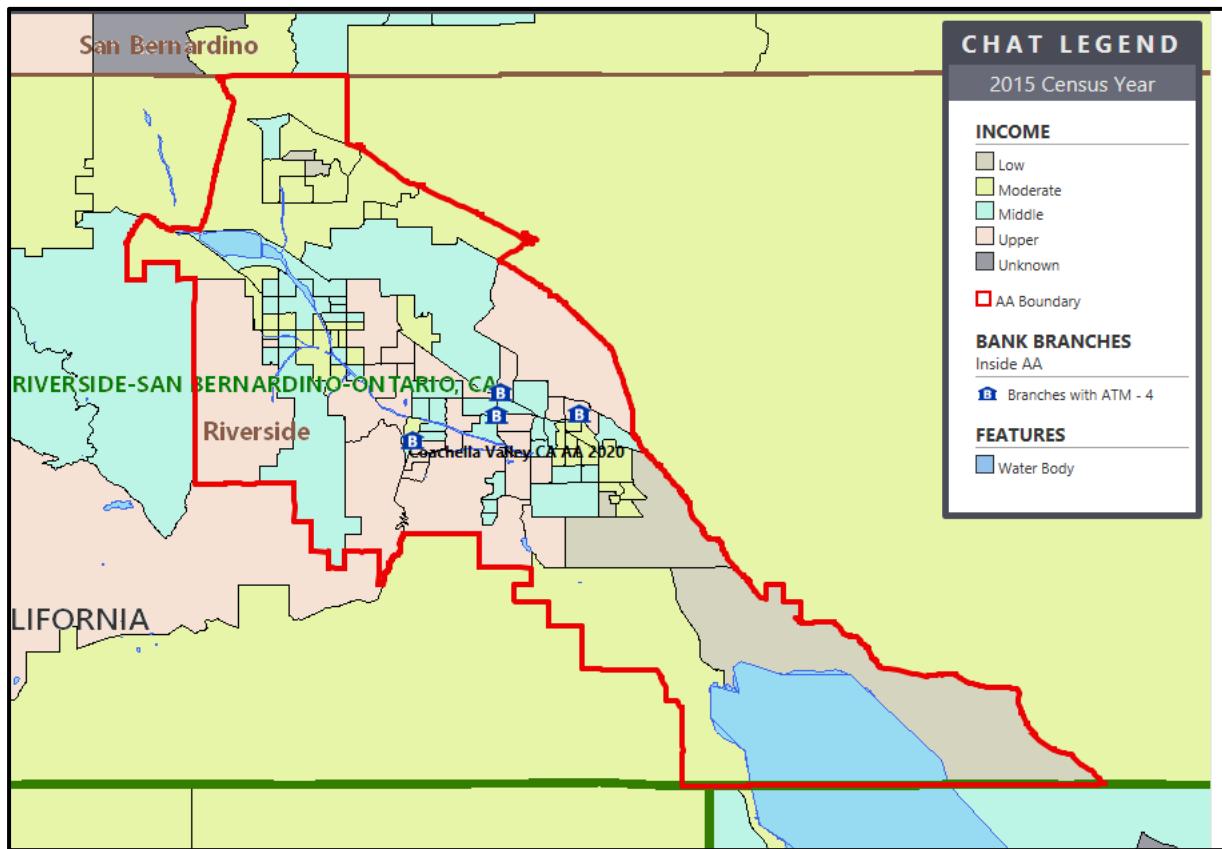
DENVER-BOULDER-GREELEY CSA AA



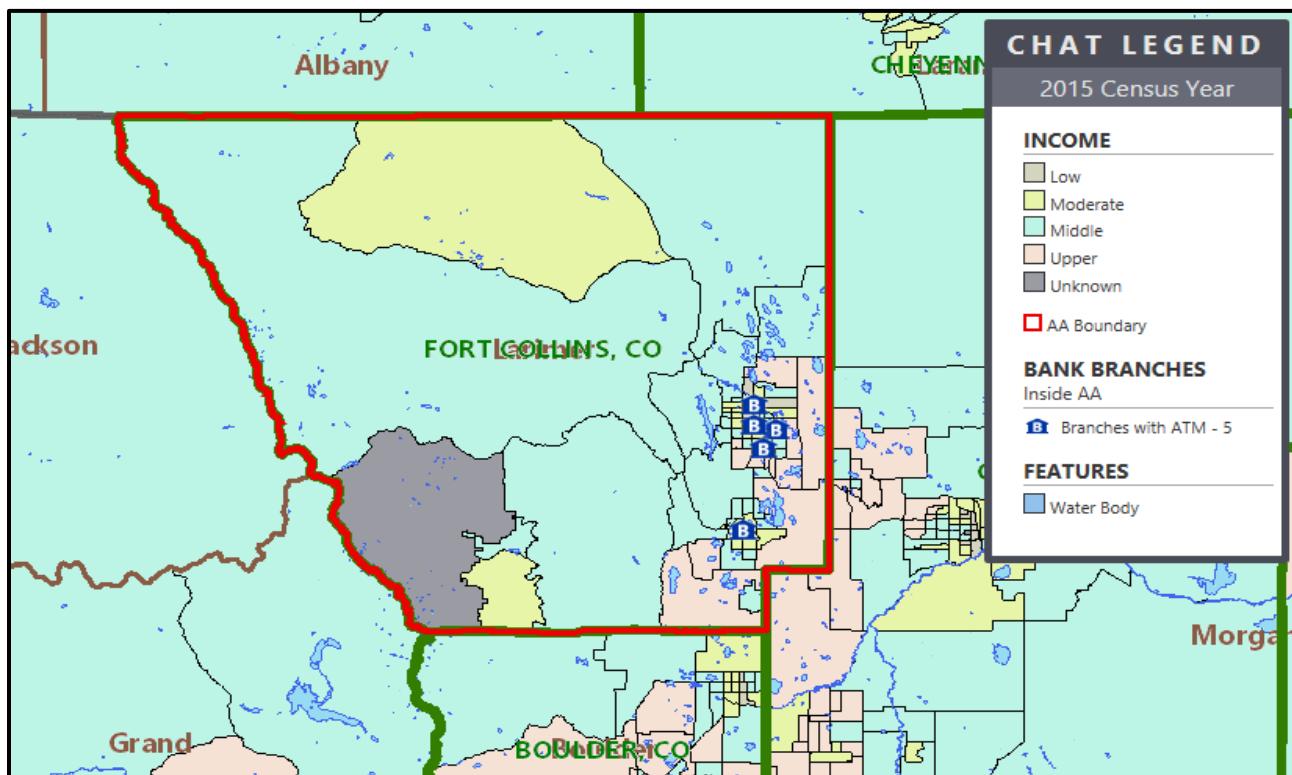
PHOENIX MSA AA



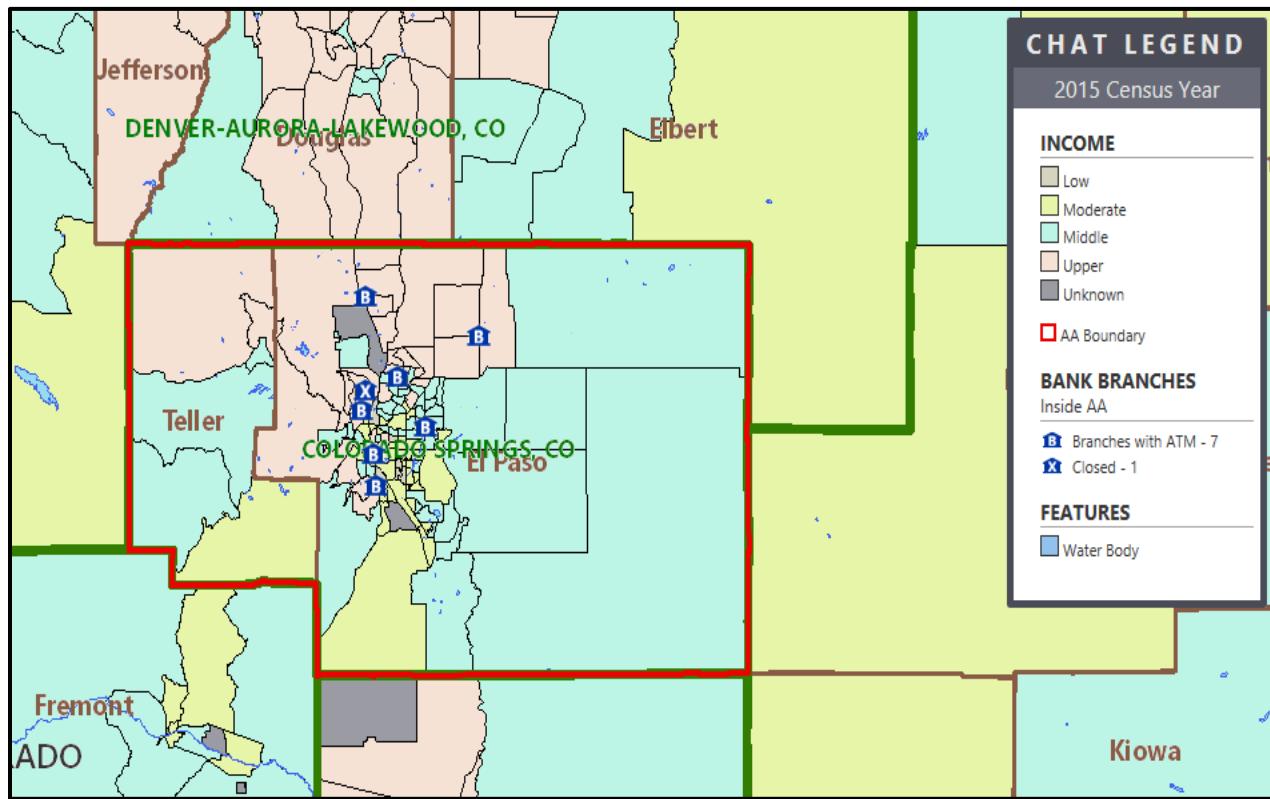
COACHELLA VALLEY METROPOLITAN AA



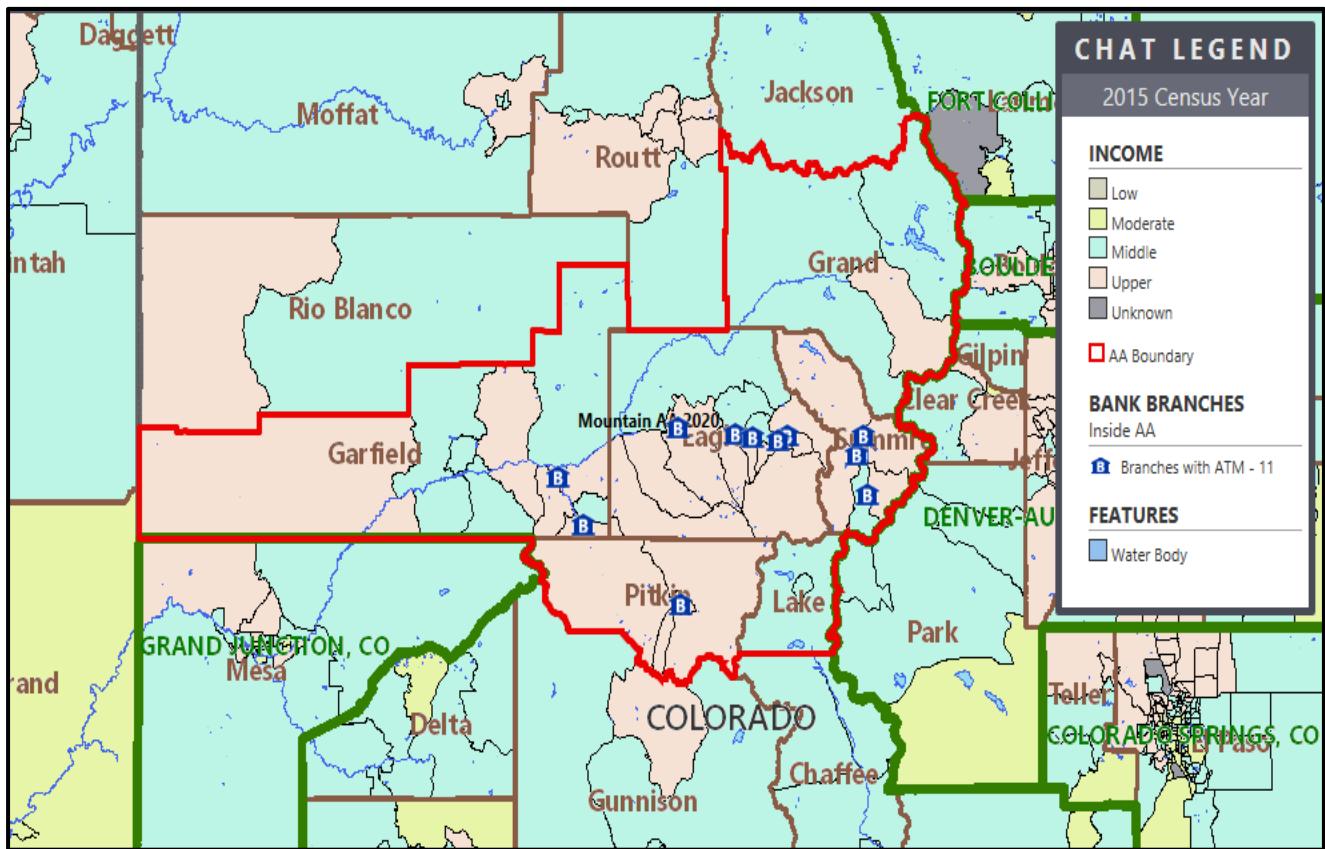
FORT COLLINS MSA AA



COLORADO SPRINGS MSA AA



MOUNTAIN AA



APPENDIX D

2018 & 2019 ANALYSIS TABLES FOR FULL-SCOPE ASSESSMENT AREAS

A. Denver-Boulder-Greeley CSA AA (Full-Scope Review) – 2019 & 2018 Demographic and Lending Tables

Table A-1
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	162	8.1	4.6	43,863	6.2	3.6	4.3
Moderate	343	17.2	18.4	88,154	12.6	14.3	18.7
Middle	634	31.7	35.2	194,866	27.7	32.3	36.0
Upper	858	43.0	41.8	375,519	53.5	49.8	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,997	100.0	100.0	702,402	100.0	100.0	100.0
Refinance Loans							
Low	73	4.6	3.9	15,241	3.1	3.0	4.3
Moderate	255	16.0	18.1	47,526	9.8	14.1	18.7
Middle	541	33.9	35.5	139,417	28.8	32.6	36.0
Upper	724	45.4	42.6	281,827	58.2	50.3	40.9
Unknown	1	0.1	0.0	192	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,594	100.0	100.0	484,203	100.0	100.0	100.0
Home Improvement Loans							
Low	34	3.5	3.0	2,267	3.1	2.4	4.3
Moderate	139	14.1	14.4	7,524	10.2	11.3	18.7
Middle	317	32.2	34.7	21,936	29.9	32.6	36.0
Upper	494	50.2	47.8	41,723	56.8	53.7	40.9
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	984	100.0	100.0	73,450	100.0	100.0	100.0
Multifamily Loans							
Low	29	27.9	20.9	33,286	10.7	11.1	14.3
Moderate	30	28.8	32.1	74,880	24.1	25.6	29.9
Middle	29	27.9	32.1	154,937	49.9	37.9	37.3
Upper	16	15.4	14.9	47,162	15.2	25.4	18.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	104	100.0	100.0	310,265	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	314	6.0	4.1	95,455	5.9	3.7	4.3
Moderate	853	16.2	17.9	223,335	13.7	14.7	18.7
Middle	1,718	32.7	35.3	525,892	32.3	32.7	36.0
Upper	2,374	45.1	42.7	782,265	48.1	48.9	40.9
Unknown	1	0.0	0.0	192	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5,260	100.0	100.0	1,627,139	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table A-2
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank			
	#	#%	#%	\$ (000)	\$ %	\$ %	
Other Purpose LOC							
Low	8	2.6	2.8	366	1.1	2.1	4.3
Moderate	29	9.4	13.9	2,189	6.3	9.8	18.7
Middle	98	31.8	35.5	9,372	27.1	30.5	36.0
Upper	173	56.2	47.9	22,624	65.5	57.5	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	308	100.0	100.0	34,551	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	8	2.9	3.6	432	1.9	1.9	4.3
Moderate	57	20.9	18.6	3,062	13.8	12.5	18.7
Middle	99	36.3	35.0	5,364	24.1	26.8	36.0
Upper	109	39.9	42.9	13,410	60.2	58.8	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	273	100.0	100.0	22,268	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	6.8	0	0.0	3.5	4.3
Moderate	0	0.0	21.7	0	0.0	22.0	18.7
Middle	0	0.0	37.4	0	0.0	30.8	36.0
Upper	0	0.0	34.0	0	0.0	43.6	40.9
Unknown	0	0.0	0.1	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-3
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	127	7.4	7.0	17,646	9.6	9.3	6.6
Moderate	349	20.3	19.4	50,787	27.5	21.2	19.8
Middle	525	30.5	31.7	47,461	25.7	30.7	33.5
Upper	717	41.7	40.3	68,285	37.0	37.4	39.8
Unknown	1	0.1	0.3	250	0.1	0.7	0.3
Tract-Unk	0	0.0	1.3	0	0.0	0.8	
Total	1,719	100.0	100.0	184,429	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table A-4 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	110	5.5	4.1	24,686	3.5	2.1	21.3
Moderate	221	11.1	19.2	58,191	8.3	13.8	17.5
Middle	245	12.3	24.5	73,091	10.4	22.0	20.4
Upper	844	42.3	37.8	337,901	48.1	47.3	40.7
Unknown	577	28.9	14.4	208,533	29.7	14.8	0.0
Total	1,997	100.0	100.0	702,402	100.0	100.0	100.0
Refinance Loans							
Low	105	6.6	6.5	12,990	2.7	3.7	21.3
Moderate	208	13.0	17.0	37,500	7.7	12.7	17.5
Middle	243	15.2	22.2	51,710	10.7	20.3	20.4
Upper	794	49.8	35.1	292,854	60.5	42.9	40.7
Unknown	244	15.3	19.2	89,149	18.4	20.4	0.0
Total	1,594	100.0	100.0	484,203	100.0	100.0	100.0
Home Improvement Loans							
Low	60	6.1	5.6	2,017	2.7	4.0	21.3
Moderate	151	15.3	15.7	7,211	9.8	12.2	17.5
Middle	200	20.3	24.1	11,130	15.2	20.2	20.4
Upper	506	51.4	52.1	45,535	62.0	59.2	40.7
Unknown	67	6.8	2.7	7,557	10.3	4.4	0.0
Total	984	100.0	100.0	73,450	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	337	6.5	5.5	42,611	3.2	3.0	21.3
Moderate	672	13.0	17.7	107,173	8.1	13.1	17.5
Middle	803	15.6	23.2	142,907	10.9	20.9	20.4
Upper	2,425	47.0	37.5	714,044	54.2	45.3	40.7
Unknown	919	17.8	16.1	310,139	23.6	17.7	0.0
Total	5,156	100.0	100.0	1,316,874	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table A-5 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	17	5.5	6.6	823	2.4	4.2	21.3
Moderate	32	10.4	16.7	2,290	6.6	10.6	17.5
Middle	49	15.9	24.7	4,234	12.3	19.0	20.4
Upper	190	61.7	50.3	24,933	72.2	64.5	40.7
Unknown	20	6.5	1.7	2,271	6.6	1.8	0.0
Total	308	100.0	100.0	34,551	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	45	16.5	8.8	2,095	9.4	4.7	21.3
Moderate	60	22.0	18.2	1,981	8.9	9.8	17.5
Middle	66	24.2	24.0	2,742	12.3	13.8	20.4
Upper	91	33.3	43.2	12,821	57.6	59.7	40.7
Unknown	11	4.0	5.8	2,629	11.8	12.0	0.0
Total	273	100.0	100.0	22,268	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.2	21.3
Moderate	0	0.0	1.1	0	0.0	0.9	17.5
Middle	0	0.0	2.6	0	0.0	3.2	20.4
Upper	0	0.0	3.7	0	0.0	4.6	40.7
Unknown	0	0.0	92.4	0	0.0	91.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table A-6
Distribution of 2019 Small Business Lending By Revenue Size of Businesses
Assessment Area: Denver-Boulder-Greeley CSA

	Bank And Aggregate Loans					Total Businesses %
	Bank		Agg	Bank		
	#	#%	#%	\$ (000)	\$%	\$%
By Revenue						
\$1 Million or Less	1,262	73.4	52.3	96,618	52.4	34.2
Over \$1 Million	376	21.9		74,201	40.2	
Revenue Unknown	81	4.7		13,610	7.4	
Total	1,719	100.0		184,429	100.0	
By Loan Size						
\$100,000 or Less	1,310	76.2	94.7	23,365	12.7	41.4
\$100,001 - \$250,000	180	10.5	2.4	34,080	18.5	12.0
\$250,001 - \$1 Million	229	13.3	2.9	126,984	68.9	46.7
Total	1,719	100.0	100.0	184,429	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	1,072	84.9		12,428	12.9	
\$100,001 - \$250,000	58	4.6		10,987	11.4	
\$250,001 - \$1 Million	132	10.5		73,203	75.8	
Total	1,262	100.0		96,618	100.0	

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table A-7
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	142	7.2	4.6	31,152	4.7	3.5	4.3
Moderate	386	19.5	18.5	88,474	13.3	14.6	18.7
Middle	628	31.7	34.2	180,423	27.2	31.4	36.0
Upper	826	41.7	42.6	363,708	54.8	50.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,982	100.0	100.0	663,757	100.0	100.0	100.0
Refinance Loans							
Low	54	4.8	4.7	9,379	3.2	3.5	4.3
Moderate	204	18.2	20.8	38,807	13.3	16.4	18.7
Middle	353	31.4	37.4	70,126	24.0	34.8	36.0
Upper	512	45.6	37.0	174,456	59.6	45.2	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,123	100.0	100.0	292,768	100.0	100.0	100.0
Home Improvement Loans							
Low	35	2.9	3.3	1,926	2.2	2.8	4.3
Moderate	180	14.8	15.5	10,233	11.4	13.4	18.7
Middle	376	31.0	35.3	24,978	27.9	32.7	36.0
Upper	622	51.3	45.9	52,353	58.5	51.1	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,213	100.0	100.0	89,490	100.0	100.0	100.0
Multifamily Loans							
Low	19	27.9	20.3	29,388	17.0	24.0	14.3
Moderate	20	29.4	31.8	68,179	39.5	29.9	29.9
Middle	17	25.0	28.7	31,385	18.2	27.6	37.3
Upper	12	17.6	19.2	43,561	25.3	18.5	18.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	68	100.0	100.0	172,513	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	266	5.2	4.5	72,526	5.7	5.2	4.3
Moderate	859	16.9	19.0	209,846	16.4	16.3	18.7
Middle	1,621	31.9	35.5	323,676	25.3	32.1	36.0
Upper	2,337	46.0	41.1	672,363	52.6	46.3	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5,083	100.0	100.0	1,278,411	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table A-8
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	9	2.2	2.9	442	1.1	2.1	4.3
Moderate	32	7.7	15.2	1,686	4.2	10.7	18.7
Middle	142	34.0	34.8	10,382	26.1	30.1	36.0
Upper	235	56.2	47.0	27,312	68.6	57.0	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	418	100.0	100.0	39,822	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	7	2.5	3.0	239	1.2	2.4	4.3
Moderate	37	13.3	15.4	2,467	12.3	11.1	18.7
Middle	105	37.6	34.3	6,382	31.8	24.3	36.0
Upper	130	46.6	47.3	10,973	54.7	62.2	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	279	100.0	100.0	20,061	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.2	0	0.0	4.8	4.3
Moderate	0	0.0	22.8	0	0.0	15.9	18.7
Middle	0	0.0	37.2	0	0.0	34.2	36.0
Upper	0	0.0	34.8	0	0.0	45.2	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table A-9
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Denver-Boulder-Greeley CSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	128	6.9	7.1	19,489	12.2	9.4	6.3
Moderate	365	19.6	19.5	38,167	24.0	22.5	19.5
Middle	560	30.1	31.8	45,354	28.5	30.4	33.5
Upper	806	43.3	40.0	55,916	35.1	36.0	40.5
Unknown	1	0.1	0.3	250	0.2	0.9	0.3
Tract-Unk	0	0.0	1.3	0	0.0	0.8	
Total	1,860	100.0	100.0	159,176	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

Table A-10
Distribution of 2018 Home Mortgage Lending By Borrower Income Level
Assessment Area: Denver-Boulder-Greeley CSA

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	80	4.0	3.8	17,963	2.7	1.9	21.3
Moderate	224	11.3	17.7	53,623	8.1	12.7	17.5
Middle	296	14.9	23.8	82,379	12.4	21.7	20.4
Upper	883	44.6	38.1	343,606	51.8	47.2	40.7
Unknown	499	25.2	16.6	166,186	25.0	16.4	0.0
Total	1,982	100.0	100.0	663,757	100.0	100.0	100.0
Refinance Loans							
Low	75	6.7	9.7	8,610	2.9	5.9	21.3
Moderate	142	12.6	21.1	19,515	6.7	16.9	17.5
Middle	194	17.3	23.4	35,913	12.3	22.7	20.4
Upper	539	48.0	31.0	169,708	58.0	39.1	40.7
Unknown	173	15.4	14.8	59,022	20.2	15.4	0.0
Total	1,123	100.0	100.0	292,768	100.0	100.0	100.0
Home Improvement Loans							
Low	78	6.4	5.1	3,215	3.6	3.6	21.3
Moderate	190	15.7	15.7	8,068	9.0	12.0	17.5
Middle	270	22.3	24.3	16,889	18.9	20.1	20.4
Upper	608	50.1	48.8	53,338	59.6	51.8	40.7
Unknown	67	5.5	6.1	7,980	8.9	12.4	0.0
Total	1,213	100.0	100.0	89,490	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	279	5.6	6.2	31,263	2.8	3.4	21.3
Moderate	687	13.7	18.5	87,364	7.9	13.9	17.5
Middle	923	18.4	23.6	145,074	13.1	21.7	20.4
Upper	2,362	47.1	36.7	605,270	54.7	44.6	40.7
Unknown	764	15.2	15.1	236,927	21.4	16.4	0.0
Total	5,015	100.0	100.0	1,105,898	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table A-11 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver-Boulder-Greeley CSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	23	5.5	6.6	999	2.5	4.2	21.3
Moderate	59	14.1	16.9	3,135	7.9	10.9	17.5
Middle	90	21.5	25.6	5,614	14.1	19.8	20.4
Upper	230	55.0	49.5	28,453	71.5	63.1	40.7
Unknown	16	3.8	1.3	1,621	4.1	2.0	0.0
Total	418	100.0	100.0	39,822	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	23	8.2	6.9	476	2.4	4.4	21.3
Moderate	72	25.8	16.7	3,023	15.1	9.2	17.5
Middle	73	26.2	24.5	4,279	21.3	15.3	20.4
Upper	102	36.6	46.7	10,165	50.7	62.6	40.7
Unknown	9	3.2	5.2	2,118	10.6	8.5	0.0
Total	279	100.0	100.0	20,061	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.1	0	0.0	1.1	21.3
Moderate	0	0.0	3.1	0	0.0	2.1	17.5
Middle	0	0.0	2.4	0	0.0	1.9	20.4
Upper	0	0.0	3.3	0	0.0	3.6	40.7
Unknown	0	0.0	89.0	0	0.0	91.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table A-12
Distribution of 2018 Small Business Lending By Revenue Size of Businesses
Assessment Area: Denver-Boulder-Greeley CSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	1,402	75.4	48.0	78,706	49.4	32.9 92.6	
Over \$1 Million	376	20.2		67,412	42.4		
Revenue Unknown	82	4.4		13,058	8.2		
Total	1,860	100.0		159,176	100.0		
By Loan Size							
\$100,000 or Less	1,484	79.8	94.3	21,623	13.6	39.3	
\$100,001 - \$250,000	179	9.6	2.6	33,757	21.2	12.6	
\$250,001 - \$1 Million	197	10.6	3.1	103,796	65.2	48.1	
Total	1,860	100.0	100.0	159,176	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1,228	87.6		9,652	12.3		
\$100,001 - \$250,000	64	4.6		11,765	14.9		
\$250,001 - \$1 Million	110	7.8		57,289	72.8		
Total	1,402	100.0		78,706	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

**Table A-13
2020 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	63	8.2	56,067	7.0	16,239	29.0	170,413	21.3
Moderate	180	23.5	173,722	21.7	23,764	13.7	139,991	17.5
Middle	261	34.1	276,919	34.7	15,568	5.6	163,406	20.4
Upper	253	33.0	292,357	36.6	7,923	2.7	325,272	40.7
Unknown	9	1.2	17	0.0	0	0.0	0	0.0
Total AA	766	100.0	799,082	100.0	63,494	7.9	799,082	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	109,702	34,582	4.3	31.5	67,527	61.6	7,593	6.9
Moderate	311,220	150,037	18.7	48.2	143,107	46.0	18,076	5.8
Middle	482,638	288,237	36.0	59.7	163,268	33.8	31,133	6.5
Upper	430,761	327,597	40.9	76.1	84,499	19.6	18,665	4.3
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,334,388	800,469	100.0	60.0	458,444	34.4	75,475	5.7
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low	14,319	6.6	12,712	6.3	1,499	10.8	108	5.5
Moderate	43,197	19.8	39,684	19.6	3,234	23.3	279	14.2
Middle	73,268	33.6	68,257	33.8	4,373	31.5	638	32.5
Upper	86,532	39.7	80,991	40.1	4,612	33.2	929	47.3
Unknown	581	0.3	402	0.2	169	1.2	10	0.5
Total AA	217,897	100.0	202,046	100.0	13,887	100.0	1,964	100.0
Percentage of Total Businesses:			92.7		6.4		0.9	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	125	4.2	115	4.0	10	12.0	0	0.0
Moderate	410	13.7	397	13.7	13	15.7	0	0.0
Middle	1,288	43.1	1,244	42.8	41	49.4	3	100.0
Upper	1,151	38.5	1,133	39.0	18	21.7	0	0.0
Unknown	16	0.5	15	0.5	1	1.2	0	0.0
Total AA	2,990	100.0	2,904	100.0	83	100.0	3	100.0
Percentage of Total Farms:			97.1		2.8		0.1	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table A-14
2019 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	63	8.2	56,067	7.0	16,239	29.0	170,413	21.3
Moderate	180	23.5	173,722	21.7	23,764	13.7	139,991	17.5
Middle	261	34.1	276,919	34.7	15,568	5.6	163,406	20.4
Upper	253	33.0	292,357	36.6	7,923	2.7	325,272	40.7
Unknown	9	1.2	17	0.0	0	0.0	0	0.0
Total AA	766	100.0	799,082	100.0	63,494	7.9	799,082	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	109,702	34,582	4.3	31.5	67,527	61.6	7,593	6.9
Moderate	311,220	150,037	18.7	48.2	143,107	46.0	18,076	5.8
Middle	482,638	288,237	36.0	59.7	163,268	33.8	31,133	6.5
Upper	430,761	327,597	40.9	76.1	84,499	19.6	18,665	4.3
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,334,388	800,469	100.0	60.0	458,444	34.4	75,475	5.7
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	14,028	6.6	12,390	6.3	1,536	10.8	102	5.2
Moderate	42,473	19.8	38,879	19.7	3,322	23.3	272	13.9
Middle	71,752	33.5	66,697	33.7	4,414	31.0	641	32.7
Upper	85,186	39.8	79,474	40.2	4,775	33.5	937	47.8
Unknown	586	0.3	389	0.2	188	1.3	9	0.5
Total AA	214,025	100.0	197,829	100.0	14,235	100.0	1,961	100.0
Percentage of Total Businesses:			92.4		6.7		0.9	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	143	4.7	132	4.5	11	12.6	0	0.0
Moderate	420	13.8	407	13.8	13	14.9	0	0.0
Middle	1,289	42.3	1,243	42.0	43	49.4	3	75.0
Upper	1,179	38.7	1,159	39.2	19	21.8	1	25.0
Unknown	17	0.6	16	0.5	1	1.1	0	0.0
Total AA	3,048	100.0	2,957	100.0	87	100.0	4	100.0
Percentage of Total Farms:			97.0		2.9		0.1	

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

**Table A-15
2018 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	63	8.2	56,067	7.0	16,239	29.0	170,413	21.3
Moderate	180	23.5	173,722	21.7	23,764	13.7	139,991	17.5
Middle	261	34.1	276,919	34.7	15,568	5.6	163,406	20.4
Upper	253	33.0	292,357	36.6	7,923	2.7	325,272	40.7
Unknown	9	1.2	17	0.0	0	0.0	0	0.0
Total AA	766	100.0	799,082	100.0	63,494	7.9	799,082	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	109,702	34,582	4.3	31.5	67,527	61.6	7,593	6.9
Moderate	311,220	150,037	18.7	48.2	143,107	46.0	18,076	5.8
Middle	482,638	288,237	36.0	59.7	163,268	33.8	31,133	6.5
Upper	430,761	327,597	40.9	76.1	84,499	19.6	18,665	4.3
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	1,334,388	800,469	100.0	60.0	458,444	34.4	75,475	5.7
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	14,922	6.3	13,188	6.0	1,606	10.7	128	4.9
Moderate	46,302	19.5	42,397	19.3	3,534	23.6	371	14.1
Middle	79,703	33.5	74,244	33.7	4,609	30.7	850	32.3
Upper	96,218	40.5	89,906	40.8	5,042	33.6	1,270	48.3
Unknown	605	0.3	389	0.2	203	1.4	13	0.5
Total AA	237,750	100.0	220,124	100.0	14,994	100.0	2,632	100.0
Percentage of Total Businesses:			92.6			6.3		
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	115	3.7	107	3.5	8	9.6	0	0.0
Moderate	422	13.5	411	13.5	11	13.3	0	0.0
Middle	1,326	42.3	1,280	42.0	43	51.8	3	75.0
Upper	1,263	40.3	1,241	40.7	21	25.3	1	25.0
Unknown	7	0.2	7	0.2	0	0.0	0	0.0
Total AA	3,133	100.0	3,046	100.0	83	100.0	4	100.0
Percentage of Total Farms:			97.2			2.6		

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

B. Phoenix MSA AA (Full-Scope Review) – 2018-2020 Demographic and 2018 & 2019 Lending Tables

Table B-1							
Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Phoenix MSA							
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	20	6.1	4.2	4,158	4.8	2.7	4.5
Moderate	77	23.6	16.4	12,091	14.0	11.8	19.6
Middle	120	36.8	41.4	22,067	25.6	36.0	37.1
Upper	109	33.4	37.4	47,870	55.5	48.7	38.7
Unknown	0	0.0	0.7	0	0.0	0.8	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	326	100.0	100.0	86,186	100.0	100.0	100.0
Refinance Loans							
Low	7	4.1	2.3	1,187	2.6	1.4	4.5
Moderate	25	14.6	13.0	4,481	9.9	9.2	19.6
Middle	60	35.1	37.8	11,713	25.9	32.1	37.1
Upper	79	46.2	46.4	27,777	61.5	56.7	38.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	171	100.0	100.0	45,158	100.0	100.0	100.0
Home Improvement Loans							
Low	3	6.7	2.4	455	11.8	1.8	4.5
Moderate	4	8.9	12.4	200	5.2	9.6	19.6
Middle	20	44.4	34.0	1,631	42.3	28.3	37.1
Upper	18	40.0	51.0	1,569	40.7	60.2	38.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	3,855	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	6	23.1	23.8	9,437	14.7	14.0	18.8
Moderate	9	34.6	38.3	9,599	15.0	29.8	31.0
Middle	5	19.2	22.4	4,970	7.7	27.0	31.0
Upper	6	23.1	14.5	40,167	62.6	27.5	18.7
Unknown	0	0.0	1.0	0	0.0	1.7	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	64,173	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	37	6.2	3.3	15,257	7.6	2.9	4.5
Moderate	117	19.7	14.7	26,421	13.1	11.8	19.6
Middle	209	35.1	39.3	40,594	20.1	33.5	37.1
Upper	232	39.0	42.1	119,320	59.2	51.1	38.7
Unknown	0	0.0	0.6	0	0.0	0.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	595	100.0	100.0	201,592	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table B-2
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.1	0	0.0	0.7	4.5
Moderate	0	0.0	10.2	0	0.0	6.3	19.6
Middle	2	12.5	32.1	40	2.4	23.1	37.1
Upper	14	87.5	56.2	1,662	97.6	69.8	38.7
Unknown	0	0.0	0.3	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,702	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	9.1	2.9	20	3.9	1.7	4.5
Moderate	2	18.2	14.0	50	9.7	7.4	19.6
Middle	2	18.2	38.5	173	33.4	24.1	37.1
Upper	6	54.5	44.2	275	53.1	66.6	38.7
Unknown	0	0.0	0.3	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	518	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.4	0	0.0	2.7	4.5
Moderate	0	0.0	17.9	0	0.0	12.3	19.6
Middle	0	0.0	44.3	0	0.0	38.2	37.1
Upper	0	0.0	33.2	0	0.0	46.5	38.7
Unknown	0	0.0	0.2	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table B-3
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Low	17	11.7	6.6	3,380	12.8	10.3	6.7
Moderate	29	20.0	16.7	6,820	25.8	18.7	17.5
Middle	41	28.3	27.9	7,791	29.5	25.8	29.9
Upper	56	38.6	47.0	8,365	31.7	43.2	45.3
Unknown	2	1.4	0.6	50	0.2	1.1	0.6
Tract-Unk	0	0.0	1.2	0	0.0	0.9	
Total	145	100.0	100.0	26,406	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table B-4 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	23	7.1	4.6	2,812	3.3	2.5	21.9
Moderate	37	11.3	18.0	6,094	7.1	12.9	17.3
Middle	29	8.9	21.6	5,241	6.1	18.8	19.5
Upper	105	32.2	36.7	34,692	40.3	47.7	41.3
Unknown	132	40.5	19.2	37,347	43.3	18.0	0.0
Total	326	100.0	100.0	86,186	100.0	100.0	100.0
Refinance Loans							
Low	5	2.9	5.3	503	1.1	2.9	21.9
Moderate	15	8.8	14.0	1,975	4.4	9.6	17.3
Middle	16	9.4	19.6	3,159	7.0	16.6	19.5
Upper	62	36.3	38.3	19,039	42.2	47.4	41.3
Unknown	73	42.7	22.8	20,482	45.4	23.5	0.0
Total	171	100.0	100.0	45,158	100.0	100.0	100.0
Home Improvement Loans							
Low	4	8.9	5.3	154	4.0	3.6	21.9
Moderate	7	15.6	13.9	251	6.5	11.0	17.3
Middle	4	8.9	22.3	314	8.1	18.8	19.5
Upper	17	37.8	55.1	1,680	43.6	62.4	41.3
Unknown	13	28.9	3.5	1,456	37.8	4.2	0.0
Total	45	100.0	100.0	3,855	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	36	6.3	4.9	3,629	2.6	2.7	21.9
Moderate	62	10.9	15.8	8,390	6.1	11.2	17.3
Middle	54	9.5	20.5	8,957	6.5	17.7	19.5
Upper	195	34.3	38.2	56,631	41.2	47.7	41.3
Unknown	222	39.0	20.5	59,812	43.5	20.7	0.0
Total	569	100.0	100.0	137,419	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table B-5 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	2	12.5	6.0	110	6.5	3.2	21.9
Moderate	2	12.5	14.1	35	2.1	8.0	17.3
Middle	1	6.3	19.8	50	2.9	13.8	19.5
Upper	9	56.3	55.8	1,136	66.7	70.7	41.3
Unknown	2	12.5	4.3	371	21.8	4.3	0.0
Total	16	100.0	100.0	1,702	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	18.2	7.4	50	9.7	4.1	21.9
Moderate	1	9.1	17.0	35	6.8	10.1	17.3
Middle	4	36.4	23.2	193	37.3	14.4	19.5
Upper	2	18.2	45.8	84	16.2	59.0	41.3
Unknown	2	18.2	6.6	156	30.1	12.5	0.0
Total	11	100.0	100.0	518	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.2	0	0.0	0.1	21.9
Moderate	0	0.0	0.4	0	0.0	0.3	17.3
Middle	0	0.0	0.8	0	0.0	1.0	19.5
Upper	0	0.0	2.5	0	0.0	4.8	41.3
Unknown	0	0.0	96.1	0	0.0	93.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table B-6
Distribution of 2019 Small Business Lending By Revenue Size of Businesses
Assessment Area: Phoenix MSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	107	73.8	49.8	15,953	60.4	32.2 92.7	
Over \$1 Million	31	21.4		8,414	31.9		
Revenue Unknown	7	4.8		2,039	7.7		
Total	145	100.0		26,406	100.0		
By Loan Size							
\$100,000 or Less	88	60.7	95.7	2,659	10.1	47.5	
\$100,001 - \$250,000	24	16.6	2.1	4,849	18.4	12.1	
\$250,001 - \$1 Million	33	22.8	2.2	18,898	71.6	40.4	
Total	145	100.0	100.0	26,406	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	75	70.1		1,923	12.1		
\$100,001 - \$250,000	9	8.4		1,682	10.5		
\$250,001 - \$1 Million	23	21.5		12,348	77.4		
Total	107	100.0		15,953	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-7
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	17	5.6	4.0	2,546	3.3	2.6	4.5
Moderate	60	19.7	16.0	9,715	12.6	11.4	19.6
Middle	110	36.1	40.9	19,875	25.8	35.1	37.1
Upper	117	38.4	38.3	44,354	57.6	50.0	38.7
Unknown	1	0.3	0.7	540	0.7	0.8	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	305	100.0	100.0	77,030	100.0	100.0	100.0
Refinance Loans							
Low	4	3.3	3.2	344	1.2	1.9	4.5
Moderate	23	18.7	16.0	2,497	9.0	11.2	19.6
Middle	46	37.4	38.9	8,369	30.2	32.8	37.1
Upper	50	40.7	41.8	16,516	59.6	53.9	38.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	123	100.0	100.0	27,726	100.0	100.0	100.0
Home Improvement Loans							
Low	1	1.8	2.1	35	0.5	1.6	4.5
Moderate	5	9.1	11.8	213	3.3	9.5	19.6
Middle	20	36.4	34.7	970	15.2	29.0	37.1
Upper	29	52.7	51.1	5,148	80.9	59.8	38.7
Unknown	0	0.0	0.3	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	55	100.0	100.0	6,366	100.0	100.0	100.0
Multifamily Loans							
Low	7	24.1	28.5	3,884	5.3	16.7	18.8
Moderate	11	37.9	35.0	14,818	20.2	25.8	31.0
Middle	5	17.2	21.2	34,807	47.6	30.0	31.0
Upper	6	20.7	14.9	19,678	26.9	27.5	18.7
Unknown	0	0.0	0.4	0	0.0	0.1	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	73,187	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	31	5.6	3.7	6,929	3.7	3.5	4.5
Moderate	104	18.9	15.8	27,451	14.7	12.4	19.6
Middle	196	35.7	39.8	64,816	34.7	33.9	37.1
Upper	217	39.5	40.2	87,112	46.6	49.7	38.7
Unknown	1	0.2	0.5	540	0.3	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	549	100.0	100.0	186,848	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table B-8
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	0	0.0	1.4	0	0.0	0.7
Moderate	2	10.0	10.6	36	2.4	6.2
Middle	7	35.0	34.0	406	27.5	23.6
Upper	11	55.0	53.7	1,035	70.1	69.3
Unknown	0	0.0	0.3	0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	20	100.0	100.0	1,477	100.0	100.0
Other Purpose Closed/Exempt						
Low	2	11.8	3.1	120	11.3	1.5
Moderate	3	17.6	15.6	172	16.2	9.8
Middle	8	47.1	37.9	389	36.6	23.5
Upper	4	23.5	43.3	381	35.9	65.1
Unknown	0	0.0	0.2	0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	17	100.0	100.0	1,062	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	5.1	0	0.0	3.7
Moderate	0	0.0	20.0	0	0.0	14.7
Middle	0	0.0	41.6	0	0.0	35.2
Upper	0	0.0	33.1	0	0.0	46.0
Unknown	0	0.0	0.3	0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-9
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Phoenix MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	8	6.3	6.7	699	2.8	11.3	6.7
Moderate	25	19.5	16.7	8,422	34.2	19.0	17.4
Middle	39	30.5	27.6	9,022	36.6	25.0	29.8
Upper	53	41.4	47.2	6,315	25.6	42.5	45.6
Unknown	3	2.3	0.6	180	0.7	1.3	0.5
Tract-Unk	0	0.0	1.2	0	0.0	0.9	
Total	128	100.0	100.0	24,638	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

Table B-10 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	8	2.6	4.2	900	1.2	2.3	21.9
Moderate	19	6.2	16.7	2,644	3.4	11.7	17.3
Middle	22	7.2	21.0	3,784	4.9	18.2	19.5
Upper	126	41.3	38.4	35,554	46.2	49.7	41.3
Unknown	130	42.6	19.8	34,148	44.3	18.2	0.0
Total	305	100.0	100.0	77,030	100.0	100.0	100.0
Refinance Loans							
Low	3	2.4	7.8	191	0.7	4.4	21.9
Moderate	10	8.1	17.9	1,147	4.1	12.8	17.3
Middle	9	7.3	21.9	1,651	6.0	19.4	19.5
Upper	34	27.6	38.3	8,529	30.8	49.6	41.3
Unknown	67	54.5	14.1	16,208	58.5	13.9	0.0
Total	123	100.0	100.0	27,726	100.0	100.0	100.0
Home Improvement Loans							
Low	2	3.6	5.0	115	1.8	3.5	21.9
Moderate	2	3.6	13.3	31	0.5	10.4	17.3
Middle	11	20.0	20.9	569	8.9	16.9	19.5
Upper	32	58.2	56.4	3,499	55.0	61.6	41.3
Unknown	8	14.5	4.4	2,152	33.8	7.6	0.0
Total	55	100.0	100.0	6,366	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	16	3.1	5.3	1,348	1.2	2.9	21.9
Moderate	36	6.9	16.6	3,958	3.5	11.8	17.3
Middle	49	9.4	20.9	6,369	5.6	18.2	19.5
Upper	212	40.8	39.2	49,326	43.4	49.6	41.3
Unknown	207	39.8	18.0	52,660	46.3	17.5	0.0
Total	520	100.0	100.0	113,661	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table B-11 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Phoenix MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	1	5.0	6.5	20	1.4	4.4	21.9
Moderate	1	5.0	15.6	30	2.0	9.6	17.3
Middle	3	15.0	20.8	130	8.8	13.9	19.5
Upper	14	70.0	54.2	1,198	81.1	69.4	41.3
Unknown	1	5.0	3.0	99	6.7	2.7	0.0
Total	20	100.0	100.0	1,477	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	11.8	7.8	122	11.5	4.6	21.9
Moderate	4	23.5	17.7	106	10.0	11.5	17.3
Middle	4	23.5	22.1	235	22.1	13.1	19.5
Upper	6	35.3	47.4	546	51.4	61.7	41.3
Unknown	1	5.9	5.0	53	5.0	9.1	0.0
Total	17	100.0	100.0	1,062	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.5	0	0.0	0.8	21.9
Moderate	0	0.0	3.1	0	0.0	1.9	17.3
Middle	0	0.0	2.5	0	0.0	1.6	19.5
Upper	0	0.0	4.5	0	0.0	3.9	41.3
Unknown	0	0.0	88.3	0	0.0	91.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table B-12
Distribution of 2018 Small Business Lending By Revenue Size of Businesses
Assessment Area: Phoenix MSA

	Bank And Aggregate Loans					Total Businesses	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	89	69.5	46.3	16,408	66.6	30.7	
Over \$1 Million	25	19.5		4,671	19.0		
Revenue Unknown	14	10.9		3,559	14.4		
Total	128	100.0		24,638	100.0		
By Loan Size							
\$100,000 or Less	73	57.0	95.3	1,745	7.1	44.1	
\$100,001 - \$250,000	25	19.5	2.3	4,380	17.8	12.5	
\$250,001 - \$1 Million	30	23.4	2.4	18,513	75.1	43.5	
Total	128	100.0	100.0	24,638	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	51	57.3		858	5.2		
\$100,001 - \$250,000	18	20.2		2,960	18.0		
\$250,001 - \$1 Million	20	22.5		12,590	76.7		
Total	89	100.0		16,408	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table B-13
2020 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	110	11.1	89,438	8.6	38,136	42.6	227,358	21.9
Moderate	231	23.3	221,107	21.3	44,951	20.3	179,229	17.3
Middle	326	32.9	359,550	34.7	31,768	8.8	202,220	19.5
Upper	311	31.4	366,049	35.3	14,716	4.0	427,610	41.3
Unknown	13	1.3	273	0.0	66	24.2	0	0.0
Total AA	991	100.0	1,036,417	100.0	129,637	12.5	1,036,417	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	171,684	43,139	4.5	25.1	100,504	58.5	28,041	16.3
Moderate	437,948	189,893	19.6	43.4	178,876	40.8	69,179	15.8
Middle	651,320	359,336	37.1	55.2	196,439	30.2	95,545	14.7
Upper	569,032	374,888	38.7	65.9	125,323	22.0	68,821	12.1
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
Total AA	1,832,045	967,478	100.0	52.8	602,639	32.9	261,928	14.3
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	16,439	6.5	14,299	6.0	1,914	13.7	226	7.6
Moderate	43,620	17.1	40,016	16.8	3,253	23.2	351	11.8
Middle	76,083	29.9	71,769	30.2	3,593	25.6	721	24.3
Upper	117,017	46.0	110,326	46.4	5,027	35.9	1,664	56.0
Unknown	1,351	0.5	1,114	0.5	228	1.6	9	0.3
Total AA	254,510	100.0	237,524	100.0	14,015	100.0	2,971	100.0
Percentage of Total Businesses:				93.3		5.5		1.2
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	79	3.8	69	3.4	10	10.6	0	0.0
Moderate	357	17.0	335	16.7	22	23.4	0	0.0
Middle	656	31.2	622	31.0	34	36.2	0	0.0
Upper	1,000	47.6	972	48.5	28	29.8	0	0.0
Unknown	8	0.4	8	0.4	0	0.0	0	0.0
Total AA	2,100	100.0	2,006	100.0	94	100.0	0	0.0
Percentage of Total Farms:				95.5		4.5		0.0

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

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

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

**Table B-14
2019 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	110	11.1	89,438	8.6	38,136	42.6	227,358	21.9
Moderate	231	23.3	221,107	21.3	44,951	20.3	179,229	17.3
Middle	326	32.9	359,550	34.7	31,768	8.8	202,220	19.5
Upper	311	31.4	366,049	35.3	14,716	4.0	427,610	41.3
Unknown	13	1.3	273	0.0	66	24.2	0	0.0
Total AA	991	100.0	1,036,417	100.0	129,637	12.5	1,036,417	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	171,684	43,139	4.5	25.1	100,504	58.5	28,041	16.3
Moderate	437,948	189,893	19.6	43.4	178,876	40.8	69,179	15.8
Middle	651,320	359,336	37.1	55.2	196,439	30.2	95,545	14.7
Upper	569,032	374,888	38.7	65.9	125,323	22.0	68,821	12.1
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
Total AA	1,832,045	967,478	100.0	52.8	602,639	32.9	261,928	14.3
Total Businesses by Tract	0							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	15,191	6.7	13,053	6.2	1,948	13.6	190	8.5
Moderate	39,563	17.5	35,968	17.1	3,327	23.3	268	12.0
Middle	67,712	29.9	63,565	30.3	3,643	25.5	504	22.6
Upper	102,605	45.3	96,200	45.9	5,150	36.0	1,255	56.4
Unknown	1,246	0.6	1,003	0.5	234	1.6	9	0.4
Total AA	226,317	100.0	209,789	100.0	14,302	100.0	2,226	100.0
Percentage of Total Businesses:			92.7		6.3		1.0	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	77	3.8	67	3.5	10	10.3	0	0.0
Moderate	364	18.0	337	17.5	27	27.8	0	0.0
Middle	645	32.0	609	31.7	36	37.1	0	0.0
Upper	925	45.8	901	46.9	24	24.7	0	0.0
Unknown	7	0.3	7	0.4	0	0.0	0	0.0
Total AA	2,018	100.0	1,921	100.0	97	100.0	0	0.0
Percentage of Total Farms:			95.2		4.8		0.0	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-15
2018 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	110	11.1	89,438	8.6	38,136	42.6	227,358	21.9
Moderate	231	23.3	221,107	21.3	44,951	20.3	179,229	17.3
Middle	326	32.9	359,550	34.7	31,768	8.8	202,220	19.5
Upper	311	31.4	366,049	35.3	14,716	4.0	427,610	41.3
Unknown	13	1.3	273	0.0	66	24.2	0	0.0
Total AA	991	100.0	1,036,417	100.0	129,637	12.5	1,036,417	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	171,684	43,139	4.5	25.1	100,504	58.5	28,041	16.3
Moderate	437,948	189,893	19.6	43.4	178,876	40.8	69,179	15.8
Middle	651,320	359,336	37.1	55.2	196,439	30.2	95,545	14.7
Upper	569,032	374,888	38.7	65.9	125,323	22.0	68,821	12.1
Unknown	2,061	222	0.0	10.8	1,497	72.6	342	16.6
Total AA	1,832,045	967,478	100.0	52.8	602,639	32.9	261,928	14.3
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	14,965	6.7	12,749	6.2	1,978	13.6	238	8.8
Moderate	38,846	17.4	35,077	17.0	3,410	23.5	359	13.3
Middle	66,614	29.8	62,275	30.2	3,687	25.4	652	24.2
Upper	101,777	45.6	95,140	46.1	5,195	35.8	1,442	53.4
Unknown	1,214	0.5	971	0.5	235	1.6	8	0.3
Total AA	223,416	100.0	206,212	100.0	14,505	100.0	2,699	100.0
Percentage of Total Businesses:			92.3		6.5		1.2	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	76	3.8	66	3.5	10	10.3	0	0.0
Moderate	370	18.5	340	17.9	28	28.9	2	100.0
Middle	638	31.9	603	31.7	35	36.1	0	0.0
Upper	908	45.4	884	46.5	24	24.7	0	0.0
Unknown	8	0.4	8	0.4	0	0.0	0	0.0
Total AA	2,000	100.0	1,901	100.0	97	100.0	2	100.0
Percentage of Total Farms:			95.1		4.9		0.1	
Source: 2018 FFIEC Census Data								
2018 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

C. Coachella Valley Metropolitan AA (Full-Scope Review) – 2018-2020 Demographic and 2018 & 2019 Lending Tables

Table C-1							
Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Coachella Valley Metropolitan							
Geographic Income Level	Bank And Aggregate Loans				Owner Occupied Units %		
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	2.2	3.1	135	0.6	1.9	4.0
Moderate	3	6.7	24.2	415	1.8	18.8	29.5
Middle	20	44.4	36.9	7,571	33.0	34.6	33.6
Upper	21	46.7	35.9	14,821	64.6	44.7	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	22,942	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.9	0	0.0	1.1	4.0
Moderate	5	13.2	20.5	715	5.2	16.1	29.5
Middle	11	28.9	37.6	2,403	17.5	35.2	33.6
Upper	22	57.9	40.0	10,648	77.3	47.7	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	13,766	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.1	0	0.0	1.9	4.0
Moderate	0	0.0	21.3	0	0.0	21.4	29.5
Middle	9	50.0	35.4	791	59.7	31.6	33.6
Upper	9	50.0	40.2	535	40.3	45.1	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	1,326	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	9.1
Moderate	0	0.0	52.2	0	0.0	26.3	38.1
Middle	1	100.0	26.1	1,404	100.0	21.3	34.0
Upper	0	0.0	21.7	0	0.0	52.4	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,404	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	0.9	2.6	135	0.3	1.5	4.0
Moderate	8	6.9	22.6	1,130	2.6	17.8	29.5
Middle	45	38.8	37.0	13,269	30.7	34.3	33.6
Upper	62	53.4	37.9	28,714	66.4	46.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	116	100.0	100.0	43,248	100.0	100.0	100.0
Source:	2019 FFIEC Census Data						
	2011-2015 U.S. Census Bureau: American Community Survey						
Note:	Percentages may not total 100.0 percent due to rounding.						

Table C-2
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.3	0	0.0	0.5	4.0
Moderate	0	0.0	18.9	0	0.0	12.2	29.5
Middle	4	44.4	34.1	1,100	48.4	34.1	33.6
Upper	5	55.6	46.7	1,175	51.6	53.2	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	2,275	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.4	0	0.0	0.3	4.0
Moderate	0	0.0	23.8	0	0.0	12.3	29.5
Middle	0	0.0	29.9	0	0.0	27.3	33.6
Upper	5	100.0	44.9	1,535	100.0	60.2	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,535	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.8	0	0.0	3.4	4.0
Moderate	0	0.0	31.1	0	0.0	21.0	29.5
Middle	0	0.0	36.3	0	0.0	35.4	33.6
Upper	0	0.0	27.7	0	0.0	40.2	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-3
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.4	0	0.0	2.3	2.4
Moderate	16	30.2	31.6	3,297	37.2	33.0	33.0
Middle	13	24.5	29.9	2,321	26.2	26.2	30.1
Upper	24	45.3	35.1	3,245	36.6	38.5	34.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	53	100.0	100.0	8,863	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table C-4 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	1.6	0	0.0	0.9	26.9
Moderate	3	6.7	9.5	425	1.9	5.3	19.4
Middle	1	2.2	17.2	230	1.0	12.3	17.5
Upper	23	51.1	55.4	13,631	59.4	65.8	36.1
Unknown	18	40.0	16.3	8,656	37.7	15.6	0.0
Total	45	100.0	100.0	22,942	100.0	100.0	100.0
Refinance Loans							
Low	1	2.6	3.6	68	0.5	2.0	26.9
Moderate	4	10.5	9.5	353	2.6	5.4	19.4
Middle	4	10.5	15.7	679	4.9	11.2	17.5
Upper	18	47.4	49.8	8,967	65.1	57.3	36.1
Unknown	11	28.9	21.4	3,699	26.9	24.2	0.0
Total	38	100.0	100.0	13,766	100.0	100.0	100.0
Home Improvement Loans							
Low	2	11.1	5.0	55	4.1	2.5	26.9
Moderate	0	0.0	10.6	0	0.0	6.3	19.4
Middle	3	16.7	21.1	200	15.1	15.5	17.5
Upper	6	33.3	58.0	376	28.4	70.7	36.1
Unknown	7	38.9	5.2	695	52.4	5.1	0.0
Total	18	100.0	100.0	1,326	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	3.5	2.7	299	0.7	1.4	26.9
Moderate	7	6.1	9.4	778	1.9	5.3	19.4
Middle	13	11.3	16.4	1,420	3.4	11.6	17.5
Upper	49	42.6	52.5	23,519	56.2	61.8	36.1
Unknown	42	36.5	19.0	15,828	37.8	19.9	0.0
Total	115	100.0	100.0	41,844	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table C-5
Distribution of 2019 Home Mortgage Lending By Borrower Income Level
Assessment Area: Coachella Valley Metropolitan

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	6.0	0	0.0	3.5	26.9
Moderate	0	0.0	10.3	0	0.0	5.6	19.4
Middle	3	33.3	17.5	280	12.3	10.2	17.5
Upper	2	22.2	63.2	545	24.0	76.0	36.1
Unknown	4	44.4	3.0	1,450	63.7	4.7	0.0
Total	9	100.0	100.0	2,275	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	20.0	6.5	176	11.5	2.0	26.9
Moderate	0	0.0	8.8	0	0.0	3.4	19.4
Middle	2	40.0	14.3	31	2.0	5.6	17.5
Upper	0	0.0	60.2	0	0.0	78.4	36.1
Unknown	2	40.0	10.2	1,328	86.5	10.6	0.0
Total	5	100.0	100.0	1,535	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.3	0	0.0	0.2	26.9
Moderate	0	0.0	1.0	0	0.0	0.9	19.4
Middle	0	0.0	1.4	0	0.0	1.2	17.5
Upper	0	0.0	2.4	0	0.0	3.0	36.1
Unknown	0	0.0	94.8	0	0.0	94.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

*Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.*

Table C-6 Distribution of 2019 Small Business Lending By Revenue Size of Businesses Assessment Area: Coachella Valley Metropolitan						
	Bank And Aggregate Loans					Total Businesses %
	Bank		Agg	Bank		
	#	#%	#%	\$ (000)	\$ %	\$ %
By Revenue						
\$1 Million or Less	33	62.3	49.9	4,860	54.8	38.2 93.7
Over \$1 Million	17	32.1		3,976	44.9	
Revenue Unknown	3	5.7		27	0.3	
Total	53	100.0		8,863	100.0	
By Loan Size						
\$100,000 or Less	34	64.2	96.5	637	7.2	52.8
\$100,001 - \$250,000	8	15.1	1.8	1,675	18.9	12.5
\$250,001 - \$1 Million	11	20.8	1.7	6,551	73.9	34.7
Total	53	100.0	100.0	8,863	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	25	75.8		294	6.0	
\$100,001 - \$250,000	2	6.1		400	8.2	
\$250,001 - \$1 Million	6	18.2		4,166	85.7	
Total	33	100.0		4,860	100.0	

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table C-7
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	2.6	2.9	179	1.2	1.6	4.0
Moderate	10	26.3	25.6	1,611	11.0	20.1	29.5
Middle	15	39.5	37.2	3,335	22.8	35.8	33.6
Upper	12	31.6	34.2	9,504	65.0	42.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	14,629	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.1	0	0.0	1.9	4.0
Moderate	3	12.0	23.8	197	1.8	17.6	29.5
Middle	6	24.0	39.0	4,403	40.7	37.1	33.6
Upper	16	64.0	34.2	6,213	57.5	43.5	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	10,813	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.0	0	0.0	1.4	4.0
Moderate	0	0.0	24.0	0	0.0	20.2	29.5
Middle	5	38.5	38.2	354	25.9	29.1	33.6
Upper	8	61.5	35.8	1,015	74.1	49.2	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,369	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	9.1
Moderate	0	0.0	51.1	0	0.0	41.6	38.1
Middle	0	0.0	31.1	0	0.0	47.0	34.0
Upper	0	0.0	17.8	0	0.0	11.4	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	1.1	2.9	179	0.5	1.6	4.0
Moderate	13	14.6	24.9	1,808	5.5	19.8	29.5
Middle	29	32.6	37.6	10,396	31.9	36.1	33.6
Upper	46	51.7	34.6	20,225	62.0	42.6	32.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	32,608	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table C-8
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	0	0.0	1.3	0	0.0	0.3
Moderate	0	0.0	19.0	0	0.0	17.8
Middle	1	12.5	33.8	75	6.7	28.5
Upper	7	87.5	46.0	1,038	93.3	53.4
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	8	100.0	100.0	1,113	100.0	100.0
Other Purpose Closed/Exempt						
Low	0	0.0	1.3	0	0.0	0.4
Moderate	0	0.0	18.5	0	0.0	8.9
Middle	2	40.0	32.8	2,229	47.6	26.3
Upper	3	60.0	47.4	2,455	52.4	64.4
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	5	100.0	100.0	4,684	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	4.0	0	0.0	1.7
Moderate	0	0.0	27.7	0	0.0	17.1
Middle	0	0.0	39.2	0	0.0	35.8
Upper	0	0.0	29.2	0	0.0	45.4
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-9
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Coachella Valley Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	2.8	0	0.0	2.1	2.4
Moderate	13	20.6	31.0	1,854	18.7	31.2	33.2
Middle	23	36.5	31.0	2,368	23.9	26.2	30.0
Upper	27	42.9	35.2	5,702	57.5	40.6	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	63	100.0	100.0	9,924	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

Table C-10 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	7	18.4	2.0	767	5.2	1.2	26.9
Moderate	2	5.3	9.2	1,119	7.6	5.5	19.4
Middle	4	10.5	16.3	756	5.2	12.3	17.5
Upper	17	44.7	57.4	7,059	48.3	68.6	36.1
Unknown	8	21.1	15.0	4,928	33.7	12.5	0.0
Total	38	100.0	100.0	14,629	100.0	100.0	100.0
Refinance Loans							
Low	1	4.0	5.5	35	0.3	3.2	26.9
Moderate	1	4.0	12.5	71	0.7	7.6	19.4
Middle	3	12.0	16.7	179	1.7	12.4	17.5
Upper	12	48.0	51.2	5,126	47.4	61.4	36.1
Unknown	8	32.0	14.1	5,402	50.0	15.4	0.0
Total	25	100.0	100.0	10,813	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.0	0	0.0	1.6	26.9
Moderate	0	0.0	10.2	0	0.0	5.3	19.4
Middle	1	7.7	18.5	25	1.8	11.3	17.5
Upper	5	38.5	58.2	494	36.1	66.6	36.1
Unknown	7	53.8	10.2	850	62.1	15.2	0.0
Total	13	100.0	100.0	1,369	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	8	9.0	3.2	802	2.5	1.8	26.9
Moderate	3	3.4	10.0	1,190	3.6	5.9	19.4
Middle	8	9.0	16.1	960	2.9	11.9	17.5
Upper	44	49.4	55.0	18,116	55.6	65.9	36.1
Unknown	26	29.2	15.7	11,540	35.4	14.5	0.0
Total	89	100.0	100.0	32,608	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table C-11 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Coachella Valley Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	7.3	0	0.0	5.0	26.9
Moderate	0	0.0	7.8	0	0.0	4.7	19.4
Middle	0	0.0	15.0	0	0.0	8.0	17.5
Upper	7	87.5	67.5	1,083	97.3	79.4	36.1
Unknown	1	12.5	2.5	30	2.7	3.0	0.0
Total	8	100.0	100.0	1,113	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	4.3	0	0.0	1.6	26.9
Moderate	0	0.0	8.2	0	0.0	3.1	19.4
Middle	0	0.0	10.8	0	0.0	3.7	17.5
Upper	3	60.0	65.9	4,354	93.0	76.1	36.1
Unknown	2	40.0	10.8	330	7.0	15.5	0.0
Total	5	100.0	100.0	4,684	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.4	0	0.0	1.1	26.9
Moderate	0	0.0	5.5	0	0.0	2.7	19.4
Middle	0	0.0	2.7	0	0.0	2.1	17.5
Upper	0	0.0	3.3	0	0.0	3.2	36.1
Unknown	0	0.0	86.0	0	0.0	90.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table C-12
Distribution of 2018 Small Business Lending By Revenue Size of Businesses
Assessment Area: Coachella Valley

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	42	66.7	48.5	3,565	35.9	34.9	
Over \$1 Million	15	23.8		4,100	41.3	6.0	
Revenue Unknown	6	9.5		2,259	22.8	0.7	
Total	63	100.0		9,924	100.0	100.0	
By Loan Size							
\$100,000 or Less	42	66.7	96.3	862	8.7	50.0	
\$100,001 - \$250,000	9	14.3	2.0	1,857	18.7	13.6	
\$250,001 - \$1 Million	12	19.0	1.7	7,205	72.6	36.4	
Total	63	100.0	100.0	9,924	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	36	85.7		512	14.4		
\$100,001 - \$250,000	3	7.1		459	12.9		
\$250,001 - \$1 Million	3	7.1		2,594	72.8		
Total	42	100.0		3,565	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table C-13
2020 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	5	4.9	8,066	7.9	3,275	40.6	27,629	26.9
Moderate	36	35.3	35,642	34.7	8,726	24.5	19,909	19.4
Middle	36	35.3	31,772	31.0	2,910	9.2	17,993	17.5
Upper	25	24.5	27,126	26.4	1,670	6.2	37,075	36.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	102,606	100.0	16,581	16.2	102,606	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	11,534	4,011	4.0	34.8	6,111	53.0	1,412	12.2
Moderate	70,401	29,965	29.5	42.6	24,684	35.1	15,752	22.4
Middle	76,499	34,111	33.6	44.6	19,294	25.2	23,094	30.2
Upper	69,235	33,357	32.9	48.2	9,810	14.2	26,068	37.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	227,669	101,444	100.0	44.6	59,899	26.3	66,326	29.1
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	491	2.5	463	2.5	21	1.9	7	6.9
Moderate	6,366	32.9	5,942	32.7	392	36.2	32	31.7
Middle	5,788	29.9	5,460	30.0	304	28.1	24	23.8
Upper	6,709	34.7	6,306	34.7	365	33.7	38	37.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19,354	100.0	18,171	100.0	1,082	100.0	101	100.0
Percentage of Total Businesses:				93.9		5.6		0.5
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	43	21.2	34	19.1	8	33.3	1	100.0
Moderate	61	30.0	48	27.0	13	54.2	0	0.0
Middle	37	18.2	37	20.8	0	0.0	0	0.0
Upper	62	30.5	59	33.1	3	12.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	203	100.0	178	100.0	24	100.0	1	100.0
Percentage of Total Farms:				87.7		11.8		0.5

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

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

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

**Table C-14
2019 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	5	4.9	8,066	7.9	3,275	40.6	27,629	26.9
Moderate	36	35.3	35,642	34.7	8,726	24.5	19,909	19.4
Middle	36	35.3	31,772	31.0	2,910	9.2	17,993	17.5
Upper	25	24.5	27,126	26.4	1,670	6.2	37,075	36.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	102,606	100.0	16,581	16.2	102,606	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	11,534	4,011	4.0	34.8	6,111	53.0	1,412	12.2
Moderate	70,401	29,965	29.5	42.6	24,684	35.1	15,752	22.4
Middle	76,499	34,111	33.6	44.6	19,294	25.2	23,094	30.2
Upper	69,235	33,357	32.9	48.2	9,810	14.2	26,068	37.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	227,669	101,444	100.0	44.6	59,899	26.3	66,326	29.1
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	460	2.4	433	2.4	21	1.9	6	6.6
Moderate	6,260	33.0	5,818	32.7	411	37.3	31	34.1
Middle	5,705	30.1	5,374	30.2	310	28.1	21	23.1
Upper	6,549	34.5	6,155	34.6	361	32.7	33	36.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18,974	100.0	17,780	100.0	1,103	100.0	91	100.0
Percentage of Total Businesses:			93.7		5.8		0.5	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	40	20.1	30	17.4	9	34.6	1	100.0
Moderate	57	28.6	43	25.0	14	53.8	0	0.0
Middle	37	18.6	37	21.5	0	0.0	0	0.0
Upper	65	32.7	62	36.0	3	11.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	199	100.0	172	100.0	26	100.0	1	100.0
Percentage of Total Farms:			86.4		13.1		0.5	
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

**Table C-15
2018 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	5	4.9	8,066	7.9	3,275	40.6	27,629	26.9
Moderate	36	35.3	35,642	34.7	8,726	24.5	19,909	19.4
Middle	36	35.3	31,772	31.0	2,910	9.2	17,993	17.5
Upper	25	24.5	27,126	26.4	1,670	6.2	37,075	36.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	102,606	100.0	16,581	16.2	102,606	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	11,534	4,011	4.0	34.8	6,111	53.0	1,412	12.2
Moderate	70,401	29,965	29.5	42.6	24,684	35.1	15,752	22.4
Middle	76,499	34,111	33.6	44.6	19,294	25.2	23,094	30.2
Upper	69,235	33,357	32.9	48.2	9,810	14.2	26,068	37.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	227,669	101,444	100.0	44.6	59,899	26.3	66,326	29.1
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	455	2.4	425	2.4	22	1.9	8	5.8
Moderate	6,256	33.2	5,791	32.9	415	36.8	50	36.5
Middle	5,654	30.0	5,303	30.2	315	27.9	36	26.3
Upper	6,481	34.4	6,061	34.5	377	33.4	43	31.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18,846	100.0	17,580	100.0	1,129	100.0	137	100.0
Percentage of Total Businesses:			93.3		6.0			0.7
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	42	21.4	32	19.2	9	32.1	1	100.0
Moderate	55	28.1	40	24.0	15	53.6	0	0.0
Middle	38	19.4	38	22.8	0	0.0	0	0.0
Upper	61	31.1	57	34.1	4	14.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	196	100.0	167	100.0	28	100.0	1	100.0
Percentage of Total Farms:			85.2		14.3			0.5
Source: 2018 FFIEC Census Data								
2018 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX E

2018-2020 ANALYSIS TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

D. Fort Collins MSA AA (Limited-Scope Review) – 2018-2020 Demographic and Lending Tables

Table D-1
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	4	1.5	2.0	1,643	1.8	1.8	1.5
Moderate	52	19.8	18.6	13,375	14.4	17.0	20.5
Middle	105	40.1	46.3	34,449	37.2	44.1	52.7
Upper	101	38.5	33.1	43,108	46.6	37.1	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	262	100.0	100.0	92,575	100.0	100.0	100.0
Refinance Loans							
Low	2	0.6	1.2	290	0.3	1.1	1.5
Moderate	65	20.8	18.3	15,411	15.1	16.3	20.5
Middle	131	42.0	47.7	38,009	37.2	45.1	52.7
Upper	114	36.5	32.7	48,579	47.5	37.4	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	312	100.0	100.0	102,289	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.0	0.8	240	2.5	0.5	1.5
Moderate	17	17.2	20.1	2,224	22.9	18.7	20.5
Middle	44	44.4	45.8	4,488	46.2	44.2	52.7
Upper	36	36.4	33.3	2,758	28.4	36.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	99	100.0	100.0	9,710	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	4	50.0	43.9	3,619	22.4	35.8	46.2
Middle	4	50.0	46.3	12,544	77.6	35.0	34.4
Upper	0	0.0	9.8	0	0.0	29.2	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	16,163	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	9	1.2	1.4	2,203	1.0	1.3	1.5
Moderate	151	19.8	18.4	35,561	15.4	16.9	20.5
Middle	315	41.4	47.4	91,902	39.7	44.6	52.7
Upper	286	37.6	32.8	101,626	43.9	37.2	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	761	100.0	100.0	231,292	100.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table D-2
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	1	1.7	0.8	30	0.5	0.6	1.5
Moderate	6	10.2	14.9	422	6.5	11.7	20.5
Middle	22	37.3	48.0	2,038	31.2	46.7	52.7
Upper	30	50.8	36.4	4,050	61.9	40.9	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	59	100.0	100.0	6,540	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.1	0	0.0	1.0	1.5
Moderate	7	33.3	21.0	510	12.7	17.9	20.5
Middle	9	42.9	43.0	374	9.3	32.8	52.7
Upper	5	23.8	34.9	3,131	78.0	48.4	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	4,015	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.6	0	0.0	1.6	1.5
Moderate	0	0.0	14.6	0	0.0	14.6	20.5
Middle	0	0.0	65.0	0	0.0	48.3	52.7
Upper	0	0.0	18.7	0	0.0	35.5	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-3
Distribution of 2020 Small Business Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	39	4.5	5.1	3,300	4.5	7.9	3.5
Moderate	247	28.6	28.4	27,699	37.9	31.1	28.9
Middle	321	37.1	37.5	20,407	27.9	30.0	42.5
Upper	258	29.8	28.3	21,663	29.6	30.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.5	
Total	865	100.0	100.0	73,069	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

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

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

Table D-4 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	32	12.2	6.1	5,481	5.9	3.8	20.5
Moderate	25	9.5	22.5	6,801	7.3	18.7	17.2
Middle	25	9.5	25.0	9,894	10.7	24.3	22.6
Upper	118	45.0	36.5	48,938	52.9	42.9	39.6
Unknown	62	23.7	10.0	21,461	23.2	10.2	0.0
Total	262	100.0	100.0	92,575	100.0	100.0	100.0
Refinance Loans							
Low	22	7.1	7.5	3,523	3.4	4.8	20.5
Moderate	37	11.9	19.4	7,178	7.0	16.1	17.2
Middle	66	21.2	24.5	16,550	16.2	23.7	22.6
Upper	138	44.2	33.4	57,400	56.1	38.7	39.6
Unknown	49	15.7	15.2	17,638	17.2	16.7	0.0
Total	312	100.0	100.0	102,289	100.0	100.0	100.0
Home Improvement Loans							
Low	2	2.0	6.7	90	0.9	5.5	20.5
Moderate	11	11.1	18.4	630	6.5	17.0	17.2
Middle	23	23.2	27.4	1,489	15.3	23.1	22.6
Upper	49	49.5	43.6	5,663	58.3	47.6	39.6
Unknown	14	14.1	3.8	1,838	18.9	6.8	0.0
Total	99	100.0	100.0	9,710	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	57	7.6	7.0	9,109	4.2	4.5	20.5
Moderate	86	11.4	20.0	15,345	7.1	16.8	17.2
Middle	128	17.0	24.5	28,584	13.3	23.8	22.6
Upper	352	46.7	34.7	120,754	56.1	40.1	39.6
Unknown	130	17.3	13.8	41,337	19.2	14.8	0.0
Total	753	100.0	100.0	215,129	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table D-5 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	6.4	0	0.0	4.1	20.5
Moderate	7	11.9	18.1	441	6.7	13.7	17.2
Middle	8	13.6	23.8	383	5.9	21.5	22.6
Upper	40	67.8	49.9	5,346	81.7	59.2	39.6
Unknown	4	6.8	1.8	370	5.7	1.5	0.0
Total	59	100.0	100.0	6,540	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	4.8	9.7	15	0.4	5.7	20.5
Moderate	6	28.6	18.8	295	7.3	13.2	17.2
Middle	6	28.6	29.6	268	6.7	21.2	22.6
Upper	7	33.3	35.5	3,407	84.9	50.1	39.6
Unknown	1	4.8	6.5	30	0.7	9.9	0.0
Total	21	100.0	100.0	4,015	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.5
Moderate	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	0.0	0	0.0	0.0	22.6
Upper	0	0.0	0.0	0	0.0	0.0	39.6
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table D-6
Distribution of 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Fort Collins MSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	93	10.8	41.2	15,000	20.5	26.2 94.0	
Over \$1 Million	34	3.9		9,063	12.4		
Revenue Unknown	738	85.3		49,006	67.1		
Total	865	100.0		73,069	100.0		
By Loan Size							
\$100,000 or Less	702	81.2	87.9	19,071	26.1	33.4	
\$100,001 - \$250,000	90	10.4	6.8	15,369	21.0	19.0	
\$250,001 - \$1 Million	73	8.4	5.3	38,629	52.9	47.7	
Total	865	100.0	100.0	73,069	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	68	73.1		896	6.0		
\$100,001 - \$250,000	2	2.2		346	2.3		
\$250,001 - \$1 Million	23	24.7		13,758	91.7		
Total	93	100.0		15,000	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table D-7
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	0.8	2.5	584	0.7	2.3	1.5
Moderate	57	22.1	19.4	15,086	18.1	17.3	20.5
Middle	115	44.6	46.0	35,828	42.9	43.4	52.7
Upper	84	32.6	32.1	32,067	38.4	37.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	258	100.0	100.0	83,565	100.0	100.0	100.0
Refinance Loans							
Low	1	0.5	1.0	201	0.3	1.0	1.5
Moderate	62	27.9	19.8	15,614	24.3	17.3	20.5
Middle	78	35.1	48.6	18,971	29.5	45.7	52.7
Upper	81	36.5	30.6	29,582	46.0	36.1	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	222	100.0	100.0	64,368	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.5	0	0.0	0.3	1.5
Moderate	14	18.2	17.3	1,119	20.2	18.0	20.5
Middle	35	45.5	51.4	2,311	41.8	48.7	52.7
Upper	28	36.4	30.7	2,101	38.0	33.0	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	77	100.0	100.0	5,531	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	3	37.5	50.0	6,460	45.6	27.2	46.2
Middle	5	62.5	42.1	7,718	54.4	52.2	34.4
Upper	0	0.0	7.9	0	0.0	20.6	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	14,178	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	0.5	1.5	785	0.5	1.5	1.5
Moderate	152	23.9	19.6	39,374	22.8	17.8	20.5
Middle	267	42.0	47.8	66,841	38.7	45.0	52.7
Upper	214	33.6	31.1	65,772	38.1	35.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	636	100.0	100.0	172,772	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table D-8
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	0	0.0	0.2	0	0.0	0.3
Moderate	7	17.1	19.7	902	27.6	19.8
Middle	18	43.9	49.6	1,169	35.8	46.7
Upper	16	39.0	30.4	1,196	36.6	33.2
Unknown	0	0.0	0.1	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	41	100.0	100.0	3,267	100.0	100.0
Other Purpose Closed/Exempt						
Low	0	0.0	0.4	0	0.0	0.5
Moderate	9	30.0	23.7	193	10.4	19.6
Middle	16	53.3	49.8	844	45.3	49.7
Upper	5	16.7	26.1	826	44.3	30.1
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	30	100.0	100.0	1,863	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	0.0	0	0.0	0.0
Moderate	0	0.0	22.2	0	0.0	20.8
Middle	0	0.0	56.5	0	0.0	50.2
Upper	0	0.0	21.3	0	0.0	29.0
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>						
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>						

Table D-9
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	8	5.3	5.0	1,290	6.0	7.9	3.5
Moderate	64	42.7	26.2	11,330	52.3	28.6	29.2
Middle	43	28.7	39.1	4,101	18.9	31.7	42.6
Upper	35	23.3	27.5	4,930	22.8	30.3	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.2	0	0.0	1.4	
Total	150	100.0	100.0	21,651	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table D-10 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	9	3.5	3.6	1,365	1.6	1.9	20.5
Moderate	20	7.8	16.4	4,820	5.8	12.8	17.2
Middle	29	11.2	23.9	6,808	8.1	22.1	22.6
Upper	115	44.6	40.2	45,626	54.6	47.4	39.6
Unknown	85	32.9	16.0	24,946	29.9	15.9	0.0
Total	258	100.0	100.0	83,565	100.0	100.0	100.0
Refinance Loans							
Low	8	3.6	6.0	775	1.2	3.4	20.5
Moderate	24	10.8	16.7	4,522	7.0	13.1	17.2
Middle	39	17.6	23.4	9,223	14.3	22.2	22.6
Upper	116	52.3	35.9	38,761	60.2	41.7	39.6
Unknown	35	15.8	18.1	11,087	17.2	19.6	0.0
Total	222	100.0	100.0	64,368	100.0	100.0	100.0
Home Improvement Loans							
Low	6	7.8	5.1	420	7.6	3.4	20.5
Moderate	5	6.5	14.0	150	2.7	11.0	17.2
Middle	25	32.5	26.9	1,725	31.2	25.8	22.6
Upper	37	48.1	51.4	3,013	54.5	55.5	39.6
Unknown	4	5.2	2.6	223	4.0	4.3	0.0
Total	77	100.0	100.0	5,531	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	33	5.3	5.0	2,903	1.8	2.7	20.5
Moderate	58	9.2	16.3	9,982	6.3	12.8	17.2
Middle	104	16.6	23.9	18,385	11.6	22.1	22.6
Upper	307	38.9	38.9	90,838	57.3	44.7	39.6
Unknown	126	20.1	15.9	36,486	23.0	17.6	0.0
Total	628	100.0	100.0	158,594	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table D-11 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	1	2.4	6.9	100	3.1	4.8	20.5
Moderate	2	4.9	14.7	35	1.1	10.0	17.2
Middle	8	19.5	27.5	525	16.1	22.5	22.6
Upper	29	70.7	49.6	2,577	78.9	61.3	39.6
Unknown	1	2.4	1.4	30	0.9	1.4	0.0
Total	41	100.0	100.0	3,267	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	9	30.0	11.0	243	13.0	7.3	20.5
Moderate	7	23.3	19.1	455	24.4	15.8	17.2
Middle	3	10.0	25.8	104	5.6	21.0	22.6
Upper	10	33.3	37.8	861	46.2	45.4	39.6
Unknown	1	3.3	6.4	200	10.7	10.5	0.0
Total	30	100.0	100.0	1,863	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.5
Moderate	0	0.0	0.9	0	0.0	1.5	17.2
Middle	0	0.0	4.6	0	0.0	3.2	22.6
Upper	0	0.0	8.3	0	0.0	9.3	39.6
Unknown	0	0.0	86.1	0	0.0	85.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table D-12
Distribution of 2019 Small Business Lending By Revenue Size of Businesses
Assessment Area: Fort Collins MSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	96	64.0	51.2	9,104	42.0	33.4 93.7	
Over \$1 Million	43	28.7		10,987	50.7	5.4	
Revenue Unknown	11	7.3		1,560	7.2	0.9	
Total	150	100.0		21,651	100.0	100.0	
By Loan Size							
\$100,000 or Less	98	65.3	93.8	2,241	10.4	38.9	
\$100,001 - \$250,000	26	17.3	3.0	5,297	24.5	14.3	
\$250,001 - \$1 Million	26	17.3	3.2	14,113	65.2	46.8	
Total	150	100.0	100.0	21,651	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	71	74.0		1,244	13.7		
\$100,001 - \$250,000	15	15.6		3,096	34.0		
\$250,001 - \$1 Million	10	10.4		4,764	52.3		
Total	96	100.0		9,104	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-13
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	2	0.7	1.8	471	0.6	1.6	1.5
Moderate	87	31.1	21.0	20,770	25.6	18.5	20.5
Middle	105	37.5	43.6	27,993	34.5	41.4	52.7
Upper	86	30.7	33.6	31,857	39.3	38.5	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	280	100.0	100.0	81,091	100.0	100.0	100.0
Refinance Loans							
Low	1	0.7	0.7	320	0.9	0.6	1.5
Moderate	37	25.0	22.9	7,991	22.8	20.2	20.5
Middle	67	45.3	51.7	15,395	44.0	50.2	52.7
Upper	43	29.1	24.7	11,272	32.2	28.9	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	148	100.0	100.0	34,978	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.8	0	0.0	0.6	1.5
Moderate	20	22.5	19.4	1,697	28.2	19.0	20.5
Middle	41	46.1	50.5	2,580	42.9	51.0	52.7
Upper	28	31.5	29.3	1,741	28.9	29.5	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	6,018	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	1	33.3	38.7	812	22.3	21.4	46.2
Middle	2	66.7	51.6	2,825	77.7	59.3	34.4
Upper	0	0.0	9.7	0	0.0	19.3	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	3,637	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	0.5	1.3	791	0.6	1.2	1.5
Moderate	160	26.2	21.4	32,694	24.4	19.3	20.5
Middle	259	42.4	47.4	52,359	39.1	45.2	52.7
Upper	189	30.9	29.9	48,080	35.9	34.3	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	611	100.0	100.0	133,924	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table D-14
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	1.1	0	0.0	0.9	1.5
Moderate	8	12.7	19.1	900	13.8	16.4	20.5
Middle	29	46.0	51.2	2,595	39.8	46.4	52.7
Upper	26	41.3	28.6	3,020	46.4	36.4	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	63	100.0	100.0	6,515	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.2	0	0.0	1.7	1.5
Moderate	7	25.0	22.7	524	31.1	22.0	20.5
Middle	15	53.6	51.9	971	57.6	53.2	52.7
Upper	6	21.4	24.2	190	11.3	23.1	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	1,685	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	2.7	0	0.0	1.9	1.5
Moderate	0	0.0	18.7	0	0.0	38.8	20.5
Middle	0	0.0	49.3	0	0.0	33.6	52.7
Upper	0	0.0	29.3	0	0.0	25.7	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table D-15
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Fort Collins MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	9	6.1	4.6	1,815	8.4	7.5	3.4
Moderate	37	25.0	26.8	6,838	31.7	29.2	29.0
Middle	47	31.8	39.7	5,754	26.7	31.0	43.1
Upper	55	37.2	26.7	7,177	33.3	31.2	24.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.2	0	0.0	1.2	
Total	148	100.0	100.0	21,584	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-16 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	13	4.6	3.3	2,100	2.6	1.7	20.5
Moderate	22	7.9	16.1	5,567	6.9	12.5	17.2
Middle	30	10.7	22.5	8,276	10.2	21.4	22.6
Upper	120	42.9	40.6	41,290	50.9	47.4	39.6
Unknown	95	33.9	17.5	23,858	29.4	17.0	0.0
Total	280	100.0	100.0	81,091	100.0	100.0	100.0
Refinance Loans							
Low	8	5.4	9.5	940	2.7	6.1	20.5
Moderate	14	9.5	19.4	2,214	6.3	16.4	17.2
Middle	20	13.5	24.7	2,697	7.7	24.0	22.6
Upper	81	54.7	33.9	22,526	64.4	40.0	39.6
Unknown	25	16.9	12.6	6,601	18.9	13.4	0.0
Total	148	100.0	100.0	34,978	100.0	100.0	100.0
Home Improvement Loans							
Low	6	6.7	5.2	185	3.1	3.4	20.5
Moderate	12	13.5	14.4	606	10.1	12.3	17.2
Middle	17	19.1	27.8	805	13.4	23.8	22.6
Upper	48	53.9	47.3	3,684	61.2	50.0	39.6
Unknown	6	6.7	5.2	738	12.3	10.6	0.0
Total	89	100.0	100.0	6,018	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	30	4.9	5.8	3,320	2.5	3.2	20.5
Moderate	62	10.2	17.1	9,273	7.1	13.6	17.2
Middle	81	13.3	23.7	12,507	9.6	22.1	22.6
Upper	303	49.8	39.0	73,415	56.3	45.0	39.6
Unknown	132	21.7	14.4	31,772	24.4	16.1	0.0
Total	608	100.0	100.0	130,287	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table D-17 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Fort Collins MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	1	1.6	6.9	25	0.4	5.5	20.5
Moderate	4	6.3	18.3	160	2.5	11.7	17.2
Middle	6	9.5	26.7	328	5.0	22.0	22.6
Upper	47	74.6	46.2	5,502	84.5	58.8	39.6
Unknown	5	7.9	1.8	500	7.7	2.0	0.0
Total	63	100.0	100.0	6,515	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	7.1	8.1	70	4.2	4.6	20.5
Moderate	10	35.7	21.5	726	43.1	20.4	17.2
Middle	8	28.6	23.5	401	23.8	16.3	22.6
Upper	7	25.0	40.4	413	24.5	45.5	39.6
Unknown	1	3.6	6.5	75	4.5	13.2	0.0
Total	28	100.0	100.0	1,685	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	4.0	0	0.0	2.3	20.5
Moderate	0	0.0	4.7	0	0.0	0.4	17.2
Middle	0	0.0	0.0	0	0.0	0.0	22.6
Upper	0	0.0	4.0	0	0.0	3.7	39.6
Unknown	0	0.0	87.3	0	0.0	93.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table D-18
Distribution of 2018 Small Business Lending By Revenue Size of Businesses
Assessment Area: Fort Collins MSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	105	70.9	46.9	9,711	45.0	34.4 93.7	
Over \$1 Million	35	23.6		10,360	48.0		
Revenue Unknown	8	5.4		1,513	7.0		
Total	148	100.0		21,584	100.0		
By Loan Size							
\$100,000 or Less	100	67.6	93.5	2,079	9.6	37.9	
\$100,001 - \$250,000	20	13.5	3.3	4,018	18.6	15.6	
\$250,001 - \$1 Million	28	18.9	3.1	15,487	71.8	46.4	
Total	148	100.0	100.0	21,584	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	82	78.1		1,233	12.7		
\$100,001 - \$250,000	11	10.5		2,345	24.1		
\$250,001 - \$1 Million	12	11.4		6,133	63.2		
Total	105	100.0		9,711	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-19
2020 Fort Collins MSA AA Demographics**

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

**Table D-20
2019 Fort Collins MSA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	771	3.5	650	3.2	112	9.5	9	4.7
Moderate	6,347	29.2	5,951	29.2	351	29.7	45	23.7
Middle	9,265	42.6	8,789	43.1	401	34.0	75	39.5
Upper	5,381	24.7	5,003	24.5	317	26.8	61	32.1
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	21,766	100.0	20,395	100.0	1,181	100.0	190	100.0
Percentage of Total Businesses:			93.7		5.4		0.9	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	7	1.5	7	1.5	0	0.0	0	0.0
Moderate	65	14.0	64	14.0	0	0.0	1	100.0
Middle	236	50.9	234	51.3	2	28.6	0	0.0
Upper	155	33.4	150	32.9	5	71.4	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	464	100.0	456	100.0	7	100.0	1	100.0
Percentage of Total Farms:			98.3		1.5		0.2	
Source: 2019 FFIEC Census Data								
2019 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-21
2018 Fort Collins MSA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.1	1,249	1.6	296	23.7	16,047	20.5
Moderate	20	27.4	17,811	22.8	1,722	9.7	13,470	17.2
Middle	36	49.3	39,955	51.1	2,307	5.8	17,701	22.6
Upper	13	17.8	19,196	24.5	710	3.7	30,998	39.6
Unknown	1	1.4	5	0.0	0	0.0	0	0.0
Total AA	73	100.0	78,216	100.0	5,035	6.4	78,216	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	2,596	1,213	1.5	46.7	1,242	47.8	141	5.4
Moderate	40,893	16,472	20.5	40.3	19,160	46.9	5,261	12.9
Middle	66,923	42,321	52.7	63.2	19,289	28.8	5,313	7.9
Upper	26,257	20,258	25.2	77.2	5,136	19.6	863	3.3
Unknown	182	0	0.0	0.0	47	25.8	135	74.2
Total AA	136,851	80,264	100.0	58.7	44,874	32.8	11,713	8.6
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	794	3.4	669	3.0	116	9.4	9	3.5
Moderate	6,829	29.0	6,386	28.9	381	30.7	62	24.2
Middle	10,162	43.1	9,634	43.7	411	33.1	117	45.7
Upper	5,775	24.5	5,375	24.4	332	26.8	68	26.6
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	23,562	100.0	22,066	100.0	1,240	100.0	256	100.0
Percentage of Total Businesses:			93.7		5.3		1.1	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	8	1.6	7	1.4	1	12.5	0	0.0
Moderate	72	14.2	71	14.2	0	0.0	1	100.0
Middle	255	50.2	252	50.5	3	37.5	0	0.0
Upper	172	33.9	168	33.7	4	50.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	508	100.0	499	100.0	8	100.0	1	100.0
Percentage of Total Farms:			98.2		1.6		0.2	
Source: 2018 FFIEC Census Data								
2018 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

E. Colorado Springs MSA AA (Limited-Scope Review) – 2018-2020 Demographic and Lending Tables

Table E-1 Distribution of 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Colorado Springs MSA							
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	11	5.7	2.3	2,466	4.3	1.5	3.2
Moderate	43	22.2	17.6	9,229	16.2	13.7	19.8
Middle	59	30.4	45.2	15,167	26.7	42.0	42.1
Upper	81	41.8	35.0	30,004	52.8	42.7	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	194	100.0	100.0	56,866	100.0	100.0	100.0
Refinance Loans							
Low	6	3.6	1.8	686	1.6	1.2	3.2
Moderate	28	16.7	14.3	5,471	12.7	11.0	19.8
Middle	58	34.5	41.8	12,646	29.4	37.6	42.1
Upper	76	45.2	42.1	24,171	56.2	50.2	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	168	100.0	100.0	42,974	100.0	100.0	100.0
Home Improvement Loans							
Low	1	2.6	1.9	205	5.6	1.7	3.2
Moderate	6	15.8	14.7	900	24.8	12.1	19.8
Middle	6	15.8	38.4	228	6.3	31.9	42.1
Upper	25	65.8	45.0	2,296	63.3	54.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	3,629	100.0	100.0	100.0
Multifamily Loans							
Low	4	17.4	12.5	3,605	10.1	10.4	11.6
Moderate	5	21.7	45.0	6,080	17.1	40.4	45.3
Middle	9	39.1	30.0	21,084	59.2	35.0	28.0
Upper	5	21.7	12.5	4,872	13.7	14.3	15.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	35,641	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	22	4.8	2.0	6,962	4.9	1.5	3.2
Moderate	85	18.7	15.6	21,792	15.4	12.7	19.8
Middle	140	30.8	42.8	49,548	35.1	39.1	42.1
Upper	208	45.7	39.6	62,938	44.6	46.6	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	455	100.0	100.0	141,240	100.0	100.0	100.0
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table E-2
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	2.1	0	0.0	1.6	3.2
Moderate	2	10.0	15.1	97	6.1	12.1	19.8
Middle	5	25.0	40.4	310	19.4	34.8	42.1
Upper	13	65.0	42.4	1,188	74.5	51.4	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	1,595	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	1.5	0	0.0	0.7	3.2
Moderate	1	8.3	13.0	15	2.8	6.6	19.8
Middle	3	25.0	38.5	113	21.1	30.0	42.1
Upper	8	66.7	46.7	407	76.1	62.1	34.9
Unknown	0	0.0	0.4	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	535	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.2	0	0.0	2.8	3.2
Moderate	0	0.0	25.9	0	0.0	17.9	19.8
Middle	0	0.0	47.9	0	0.0	47.8	42.1
Upper	0	0.0	21.0	0	0.0	31.5	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table E-3
Distribution of 2020 Small Business Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	62	8.3	8.3	6,047	10.6	12.4	7.4
Moderate	134	18.0	23.3	11,959	21.0	26.2	22.9
Middle	180	24.2	30.3	18,852	33.1	25.8	33.5
Upper	367	49.4	37.6	20,125	35.3	34.9	36.1
Unknown	0	0.0	0.0	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.6	0	0.0	0.5	
Total	743	100.0	100.0	56,983	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

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

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

Table E-4							
Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	9	4.6	3.3	1,534	2.7	1.8	20.2
Moderate	16	8.2	21.3	4,087	7.2	16.9	18.5
Middle	21	10.8	26.3	4,800	8.4	24.7	20.3
Upper	96	49.5	34.4	30,651	53.9	41.3	41.0
Unknown	52	26.8	14.7	15,794	27.8	15.3	0.0
Total	194	100.0	100.0	56,866	100.0	100.0	100.0
Refinance Loans							
Low	8	4.8	3.9	749	1.7	2.2	20.2
Moderate	20	11.9	12.2	3,320	7.7	9.0	18.5
Middle	13	7.7	16.0	3,440	8.0	14.2	20.3
Upper	91	54.2	27.3	26,927	62.7	30.4	41.0
Unknown	36	21.4	40.6	8,538	19.9	44.2	0.0
Total	168	100.0	100.0	42,974	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.0	0	0.0	3.3	20.2
Moderate	4	10.5	14.2	133	3.7	11.2	18.5
Middle	5	13.2	22.2	598	16.5	18.0	20.3
Upper	21	55.3	57.0	2,058	56.7	62.4	41.0
Unknown	8	21.1	2.6	840	23.1	5.1	0.0
Total	38	100.0	100.0	3,629	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	21	4.9	3.7	2,549	2.4	2.1	20.2
Moderate	44	10.2	15.1	7,780	7.4	11.9	18.5
Middle	46	10.6	19.6	9,163	8.7	18.1	20.3
Upper	224	51.9	30.8	60,835	57.6	34.8	41.0
Unknown	97	22.5	30.7	25,272	23.9	33.2	0.0
Total	432	100.0	100.0	105,599	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table E-5 Distribution of 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Other Purpose LOC							
Low	1	5.0	5.4	50	3.1	3.3	20.2
Moderate	2	10.0	15.9	200	12.5	11.8	18.5
Middle	2	10.0	24.2	140	8.8	20.8	20.3
Upper	14	70.0	54.1	1,105	69.3	63.7	41.0
Unknown	1	5.0	0.4	100	6.3	0.5	0.0
Total	20	100.0	100.0	1,595	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	3	25.0	5.9	216	40.4	3.0	20.2
Moderate	2	16.7	18.5	40	7.5	15.0	18.5
Middle	5	41.7	22.6	185	34.6	18.2	20.3
Upper	2	16.7	44.4	94	17.6	55.1	41.0
Unknown	0	0.0	8.5	0	0.0	8.7	0.0
Total	12	100.0	100.0	535	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.1	0	0.0	0.1	20.2
Moderate	0	0.0	0.1	0	0.0	0.1	18.5
Middle	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	0.2	0	0.0	0.3	41.0
Unknown	0	0.0	99.5	0	0.0	99.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table E-6
Distribution of 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Colorado Springs MSA

	Bank And Aggregate Loans					Total Businesses %		
	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%			
By Revenue								
\$1 Million or Less	110	14.8	43.8	13,821	24.3	25.5	94.5	
Over \$1 Million	27	3.6		5,110	9.0	9.0	4.8	
Revenue Unknown	606	81.6		38,052	66.8		0.7	
Total	743	100.0		56,983	100.0		100.0	
By Loan Size								
\$100,000 or Less	598	80.5	90.6	16,314	28.6	38.0		
\$100,001 - \$250,000	93	12.5		15,303	26.9	20.0		
\$250,001 - \$1 Million	52	7.0		25,366	44.5	42.0		
Total	743	100.0		56,983	100.0	100.0		
By Loan Size and Revenues \$1 Million or Less								
\$100,000 or Less	75	68.2	1,003	7.3				
\$100,001 - \$250,000	13	11.8		2,208	16.0			
\$250,001 - \$1 Million	22	20.0		10,610	76.8			
Total	110	100.0		13,821	100.0			
<i>Source:</i>	2020 FFIEC Census Data							
	2020 Dun & Bradstreet Data							
	2011-2015 U.S. Census Bureau: American Community Survey							
<i>Note:</i>	Percentages may not total 100.0 percent due to rounding.							

Table E-7
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	6	3.6	2.7	1,128	2.5	1.9	3.2
Moderate	40	24.0	18.3	7,462	16.6	14.5	19.8
Middle	52	31.1	45.4	12,669	28.2	42.1	42.1
Upper	69	41.3	33.6	23,676	52.7	41.5	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	167	100.0	100.0	44,935	100.0	100.0	100.0
Refinance Loans							
Low	6	6.0	2.1	1,008	4.3	1.4	3.2
Moderate	22	22.0	16.6	3,642	15.4	12.5	19.8
Middle	32	32.0	44.7	5,788	24.5	40.8	42.1
Upper	40	40.0	36.6	13,167	55.8	45.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	100	100.0	100.0	23,605	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	1.6	3.2
Moderate	9	17.6	16.4	440	13.5	15.4	19.8
Middle	11	21.6	40.4	467	14.3	37.4	42.1
Upper	31	60.8	41.2	2,350	72.2	45.6	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	3,257	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	10.0	0	0.0	7.9	11.6
Moderate	3	42.9	36.3	1,594	10.0	25.4	45.3
Middle	3	42.9	30.0	13,113	82.4	24.8	28.0
Upper	1	14.3	23.8	1,200	7.5	41.9	15.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	15,907	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	12	3.3	2.4	2,136	2.3	2.0	3.2
Moderate	77	21.3	17.6	13,363	14.7	14.2	19.8
Middle	106	29.4	44.7	32,361	35.5	40.5	42.1
Upper	166	46.0	35.3	43,177	47.4	43.3	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	361	100.0	100.0	91,037	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table E-8
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	0	0.0	2.1	0	0.0	1.5
Moderate	1	5.9	18.2	100	4.1	15.0
Middle	3	17.6	41.8	175	7.1	34.4
Upper	13	76.5	38.0	2,180	88.8	49.1
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	17	100.0	100.0	2,455	100.0	100.0
Other Purpose Closed/Exempt						
Low	0	0.0	2.8	0	0.0	1.4
Moderate	2	10.5	15.5	125	14.2	9.6
Middle	5	26.3	40.6	149	17.0	36.5
Upper	12	63.2	41.1	604	68.8	52.5
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	19	100.0	100.0	878	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	3.9	0	0.0	3.4
Moderate	0	0.0	28.0	0	0.0	20.7
Middle	0	0.0	48.4	0	0.0	48.9
Upper	0	0.0	19.7	0	0.0	27.0
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-9
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	14	9.7	6.8	2,572	13.2	9.5	7.4
Moderate	36	25.0	21.8	5,904	30.4	25.0	23.0
Middle	44	30.6	32.5	3,679	18.9	27.3	33.5
Upper	50	34.7	37.4	7,298	37.5	37.0	35.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	1.4	0	0.0	1.2	
Total	144	100.0	100.0	19,453	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table E-10
Distribution of 2019 Home Mortgage Lending By Borrower Income Level
Assessment Area: Colorado Springs MSA

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	10	6.0	4.1	1,602	3.6	2.3	20.2
Moderate	16	9.6	21.9	3,245	7.2	17.2	18.5
Middle	17	10.2	26.0	3,498	7.8	24.8	20.3
Upper	75	44.9	32.5	23,815	53.0	39.7	41.0
Unknown	49	29.3	15.4	12,775	28.4	16.0	0.0
Total	167	100.0	100.0	44,935	100.0	100.0	100.0
Refinance Loans							
Low	7	7.0	6.3	737	3.1	3.7	20.2
Moderate	6	6.0	13.8	888	3.8	10.2	18.5
Middle	14	14.0	18.2	2,648	11.2	16.3	20.3
Upper	43	43.0	25.6	12,937	54.8	29.8	41.0
Unknown	30	30.0	36.2	6,395	27.1	40.1	0.0
Total	100	100.0	100.0	23,605	100.0	100.0	100.0
Home Improvement Loans							
Low	3	5.9	8.9	48	1.5	6.2	20.2
Moderate	7	13.7	16.8	265	8.1	14.3	18.5
Middle	12	23.5	22.2	487	15.0	19.9	20.3
Upper	24	47.1	49.9	2,024	62.1	55.4	41.0
Unknown	5	9.8	2.1	433	13.3	4.2	0.0
Total	51	100.0	100.0	3,257	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	22	6.2	5.6	2,645	3.5	3.1	20.2
Moderate	35	9.9	17.7	4,675	6.2	13.8	18.5
Middle	48	13.6	22.1	6,731	9.0	20.6	20.3
Upper	161	45.5	30.6	41,012	54.6	35.4	41.0
Unknown	88	24.9	24.0	20,067	26.7	27.1	0.0
Total	354	100.0	100.0	75,130	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table E-11 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	11.8	0	0.0	8.7	20.2
Moderate	2	11.8	16.5	130	5.3	12.3	18.5
Middle	0	0.0	23.2	0	0.0	20.6	20.3
Upper	12	70.6	48.1	1,906	77.6	57.7	41.0
Unknown	3	17.6	0.5	419	17.1	0.7	0.0
Total	17	100.0	100.0	2,455	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	10.5	7.9	258	29.4	5.8	20.2
Moderate	4	21.1	17.3	147	16.7	11.6	18.5
Middle	5	26.3	22.1	98	11.2	19.2	20.3
Upper	7	36.8	47.5	330	37.6	53.9	41.0
Unknown	1	5.3	5.3	45	5.1	9.4	0.0
Total	19	100.0	100.0	878	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.5	0	0.0	0.1	20.2
Moderate	0	0.0	0.5	0	0.0	0.4	18.5
Middle	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	2.5	0	0.0	4.9	41.0
Unknown	0	0.0	96.6	0	0.0	94.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table E-12
Distribution of 2019 Small Business Lending By Revenue Size of Businesses
Assessment Area: Colorado Springs MSA

	Bank And Aggregate Loans					Total Businesses	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	99	68.8	55.2	10,601	54.5	40.2	
Over \$1 Million	36	25.0		7,841	40.3	5.1	
Revenue Unknown	9	6.3		1,011	5.2	0.7	
Total	144	100.0		19,453	100.0	100.0	
By Loan Size							
\$100,000 or Less	101	70.1	96.6	1,914	9.8	50.5	
\$100,001 - \$250,000	18	12.5	1.6	3,078	15.8	11.0	
\$250,001 - \$1 Million	25	17.4	1.8	14,461	74.3	38.6	
Total	144	100.0	100.0	19,453	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	75	75.8		1,029	9.7		
\$100,001 - \$250,000	8	8.1		1,334	12.6		
\$250,001 - \$1 Million	16	16.2		8,238	77.7		
Total	99	100.0		10,601	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-13
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	14	5.7	2.4	3,142	5.6	1.7	3.2
Moderate	72	29.5	18.4	13,163	23.4	14.2	19.8
Middle	87	35.7	44.2	20,330	36.1	40.6	42.1
Upper	71	29.1	35.0	19,618	34.9	43.5	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	244	100.0	100.0	56,253	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.9	0	0.0	1.9	3.2
Moderate	13	21.0	20.0	2,056	18.7	15.3	19.8
Middle	30	48.4	45.6	5,198	47.4	43.2	42.1
Upper	19	30.6	31.5	3,714	33.9	39.6	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	62	100.0	100.0	10,968	100.0	100.0	100.0
Home Improvement Loans							
Low	2	3.3	1.5	97	2.6	1.2	3.2
Moderate	7	11.7	17.2	290	7.9	16.7	19.8
Middle	19	31.7	40.2	1,058	28.7	36.5	42.1
Upper	32	53.3	41.1	2,246	60.9	45.7	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	60	100.0	100.0	3,691	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	15.7	0	0.0	13.3	11.6
Moderate	1	50.0	38.6	465	60.8	23.8	45.3
Middle	1	50.0	35.7	300	39.2	42.1	28.0
Upper	0	0.0	10.0	0	0.0	20.8	15.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	765	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	18	4.4	2.6	3,399	4.5	2.4	3.2
Moderate	98	23.8	18.7	16,433	21.6	15.1	19.8
Middle	154	37.5	44.2	28,023	36.8	41.1	42.1
Upper	141	34.3	34.5	28,210	37.1	41.4	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	411	100.0	100.0	76,065	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table E-14
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Other Purpose LOC						
Low	2	7.7	2.5	160	4.6	1.9
Moderate	2	7.7	16.3	200	5.8	13.2
Middle	7	26.9	42.5	637	18.3	36.0
Upper	15	57.7	38.8	2,481	71.3	48.9
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	26	100.0	100.0	3,478	100.0	100.0
Other Purpose Closed/Exempt						
Low	0	0.0	2.4	0	0.0	0.9
Moderate	3	17.6	16.6	259	28.5	9.4
Middle	10	58.8	39.7	500	54.9	31.9
Upper	4	23.5	41.3	151	16.6	57.8
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	17	100.0	100.0	910	100.0	100.0
Purpose Not Applicable						
Low	0	0.0	4.8	0	0.0	2.9
Moderate	0	0.0	25.6	0	0.0	20.0
Middle	0	0.0	47.8	0	0.0	46.5
Upper	0	0.0	21.7	0	0.0	30.7
Unknown	0	0.0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-15
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Colorado Springs MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	23	20.2	7.2	3,315	27.0	11.1	7.1
Moderate	22	19.3	21.5	3,335	27.1	24.8	22.6
Middle	29	25.4	33.1	2,925	23.8	29.4	33.7
Upper	40	35.1	36.8	2,715	22.1	33.4	36.4
Unknown	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	1.3	0	0.0	1.1	
Total	114	100.0	100.0	12,290	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

Table E-16 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	8	3.3	3.8	1,400	2.5	2.2	20.2
Moderate	21	8.6	21.0	3,617	6.4	16.3	18.5
Middle	20	8.2	24.3	4,351	7.7	23.1	20.3
Upper	104	42.6	32.0	28,807	51.2	39.3	41.0
Unknown	91	37.3	18.9	18,078	32.1	19.0	0.0
Total	244	100.0	100.0	56,253	100.0	100.0	100.0
Refinance Loans							
Low	4	6.5	9.1	323	2.9	5.6	20.2
Moderate	6	9.7	20.3	573	5.2	16.5	18.5
Middle	14	22.6	23.1	2,763	25.2	22.8	20.3
Upper	21	33.9	29.7	3,690	33.6	36.6	41.0
Unknown	17	27.4	17.8	3,619	33.0	18.5	0.0
Total	62	100.0	100.0	10,968	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.8	0	0.0	3.9	20.2
Moderate	7	11.7	15.0	371	10.1	13.3	18.5
Middle	21	35.0	25.4	775	21.0	22.4	20.3
Upper	27	45.0	49.9	1,915	51.9	49.3	41.0
Unknown	5	8.3	4.9	630	17.1	11.1	0.0
Total	60	100.0	100.0	3,691	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	14	3.4	5.5	1,843	2.4	3.2	20.2
Moderate	40	9.8	19.9	4,895	6.5	16.0	18.5
Middle	64	15.6	23.7	8,455	11.2	22.7	20.3
Upper	176	43.0	33.4	37,144	49.3	38.9	41.0
Unknown	115	28.1	17.5	22,963	30.5	19.1	0.0
Total	409	100.0	100.0	75,300	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

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

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

Multifamily loans are not included in the borrower distribution analysis.

Table E-17 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Colorado Springs MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	6.4	0	0.0	4.4	20.2
Moderate	4	15.4	16.7	193	5.5	12.2	18.5
Middle	5	19.2	24.6	340	9.8	20.6	20.3
Upper	16	61.5	51.8	2,345	67.4	61.5	41.0
Unknown	1	3.8	0.5	600	17.3	1.2	0.0
Total	26	100.0	100.0	3,478	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	11.8	6.8	120	13.2	6.6	20.2
Moderate	2	11.8	19.8	141	15.5	10.8	18.5
Middle	4	23.5	23.1	226	24.8	18.6	20.3
Upper	8	47.1	45.9	387	42.5	52.4	41.0
Unknown	1	5.9	4.3	36	4.0	11.5	0.0
Total	17	100.0	100.0	910	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.1	0	0.0	0.7	20.2
Moderate	0	0.0	1.3	0	0.0	1.7	18.5
Middle	0	0.0	1.4	0	0.0	2.1	20.3
Upper	0	0.0	3.5	0	0.0	4.2	41.0
Unknown	0	0.0	92.6	0	0.0	91.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table E-18
Distribution of 2018 Small Business Lending By Revenue Size of Businesses
Assessment Area: Colorado Springs MSA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	83	72.8	52.6	5,161	42.0	38.9 94.2	
Over \$1 Million	26	22.8		5,417	44.1	4.9	
Revenue Unknown	5	4.4		1,712	13.9	0.9	
Total	114	100.0		12,290	100.0	100.0	
By Loan Size							
\$100,000 or Less	87	76.3	96.2	1,447	11.8	47.0	
\$100,001 - \$250,000	12	10.5	1.8	2,443	19.9	11.7	
\$250,001 - \$1 Million	15	13.2	2.0	8,400	68.3	41.4	
Total	114	100.0	100.0	12,290	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	71	85.5		818	15.8		
\$100,001 - \$250,000	7	8.4		1,294	25.1		
\$250,001 - \$1 Million	5	6.0		3,049	59.1		
Total	83	100.0		5,161	100.0		

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-19
2020 Colorado Springs MSA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	274,475	161,082	100.0	58.7	93,786	34.2	19,607	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	2,815	7.4	2,516	7.0	279	15.4	20	7.3
Moderate	8,648	22.9	8,072	22.6	528	29.1	48	17.6
Middle	12,669	33.5	12,143	34.0	432	23.8	94	34.4
Upper	13,639	36.1	12,959	36.3	569	31.3	111	40.7
Unknown	55	0.1	48	0.1	7	0.4	0	0.0
Total AA	37,826	100.0	35,738	100.0	1,815	100.0	273	100.0
Percentage of Total Businesses:				94.5		4.8		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	14	3.0	14	3.1	0	0.0	0	0.0
Moderate	70	15.0	69	15.0	1	14.3	0	0.0
Middle	221	47.4	217	47.3	4	57.1	0	0.0
Upper	161	34.5	159	34.6	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	466	100.0	459	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

**Table E-20
2019 Colorado Springs MSA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	274,475	161,082	100.0	58.7	93,786	34.2	19,607	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	2,742	7.4	2,432	7.0	295	15.8	15	5.8
Moderate	8,527	23.0	7,945	22.8	535	28.6	47	18.1
Middle	12,414	33.5	11,879	34.1	446	23.8	89	34.2
Upper	13,271	35.9	12,574	36.1	588	31.4	109	41.9
Unknown	55	0.1	48	0.1	7	0.4	0	0.0
Total AA	37,009	100.0	34,878	100.0	1,871	100.0	260	100.0
Percentage of Total Businesses:				94.2		5.1		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	22	4.5	22	4.6	0	0.0	0	0.0
Moderate	75	15.4	74	15.4	1	14.3	0	0.0
Middle	220	45.3	216	45.1	4	57.1	0	0.0
Upper	169	34.8	167	34.9	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	486	100.0	479	100.0	7	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

**Table E-21
2018 Colorado Springs MSA AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	5.1	6,804	3.9	2,104	30.9	35,330	20.2
Moderate	41	30.1	41,922	24.0	6,108	14.6	32,343	18.5
Middle	53	39.0	71,435	40.8	4,159	5.8	35,569	20.3
Upper	33	24.3	54,701	31.3	2,054	3.8	71,701	41.0
Unknown	2	1.5	81	0.0	35	43.2	0	0.0
Total AA	136	100.0	174,943	100.0	14,460	8.3	174,943	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
Low	13,764	5,079	3.2	36.9	7,439	54.0	1,246	9.1
Moderate	76,110	31,935	19.8	42.0	38,221	50.2	5,954	7.8
Middle	108,053	67,824	42.1	62.8	33,169	30.7	7,060	6.5
Upper	76,467	56,244	34.9	73.6	14,876	19.5	5,347	7.0
Unknown	81	0	0.0	0.0	81	100.0	0	0.0
Total AA	274,475	161,082	100.0	58.7	93,786	34.2	19,607	7.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	2,874	7.1	2,546	6.7	307	15.5	21	5.7
Moderate	9,143	22.6	8,508	22.4	561	28.3	74	20.1
Middle	13,595	33.7	13,006	34.2	477	24.1	112	30.4
Upper	14,721	36.4	13,936	36.6	626	31.6	159	43.2
Unknown	58	0.1	47	0.1	9	0.5	2	0.5
Total AA	40,391	100.0	38,043	100.0	1,980	100.0	368	100.0
Percentage of Total Businesses:				94.2		4.9		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	13	2.7	13	2.7	0	0.0	0	0.0
Moderate	64	13.1	63	13.0	1	16.7	0	0.0
Middle	233	47.6	230	47.5	3	50.0	0	0.0
Upper	180	36.7	178	36.8	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	490	100.0	484	100.0	6	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
<p>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

F. Mountain AA (Limited-Scope Review) – 2018-2020 Demographic and Lending Tables

Table F-1 Distribution of 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Mountain							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	130	28.6	30.0	73,932	24.9	22.6	33.6
Upper	325	71.4	70.0	222,725	75.1	77.4	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	455	100.0	100.0	296,657	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	91	24.9	30.2	33,977	17.5	21.9	33.6
Upper	275	75.1	69.8	160,390	82.5	78.0	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	366	100.0	100.0	194,367	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	25	19.2	28.8	3,176	13.4	22.7	33.6
Upper	105	80.8	71.0	20,588	86.6	77.2	66.4
Unknown	0	0.0	0.2	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	130	100.0	100.0	23,764	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	40.0	42.1	4,298	21.2	21.5	24.6
Upper	3	60.0	57.9	15,941	78.8	78.5	75.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	20,239	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	280	26.7	30.0	120,475	21.6	21.6	33.6
Upper	768	73.3	70.0	437,765	78.4	78.4	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1,048	100.0	100.0	558,240	100.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-2
Distribution of 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	22	37.3	26.7	3,346	33.4	16.9	33.6
Upper	37	62.7	73.3	6,677	66.6	83.1	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unc	0	0.0	0.0	0	0.0	0.0	
Total	59	100.0	100.0	10,023	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	10	30.3	21.1	1,746	13.2	6.7	33.6
Upper	23	69.7	78.9	11,444	86.8	93.3	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unc	0	0.0	0.0	0	0.0	0.0	
Total	33	100.0	100.0	13,190	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	10.4	0.0
Middle	0	0.0	38.6	0	0.0	34.0	33.6
Upper	0	0.0	61.4	0	0.0	66.0	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unc	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table F-3
Distribution of 2020 Small Business Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	417	25.9	28.7	33,558	30.8	30.5	34.7
Upper	1,191	74.1	67.7	75,349	69.2	67.0	65.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.6	0	0.0	2.5	
Total	1,608	100.0	100.0	108,907	100.0	100.0	100.0

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

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

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

Table F-4
Distribution of 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Mountain

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %
	Bank		Agg	Bank		
	#	#%	#%	\$(000)	\$%	\$%
Home Purchase Loans						
Low	4	0.9	0.8	969	0.3	0.3
Moderate	16	3.5	6.1	4,209	1.4	2.3
Middle	41	9.0	12.6	13,307	4.5	6.4
Upper	285	62.6	69.4	171,561	57.8	72.3
Unknown	109	24.0	11.1	106,611	35.9	18.7
Total	455	100.0	100.0	296,657	100.0	100.0
Refinance Loans						
Low	4	1.1	1.3	499	0.3	0.6
Moderate	16	4.4	6.4	2,729	1.4	3.1
Middle	38	10.4	14.6	9,386	4.8	9.0
Upper	234	63.9	65.6	117,376	60.4	67.9
Unknown	74	20.2	12.0	64,377	33.1	19.5
Total	366	100.0	100.0	194,367	100.0	100.0
Home Improvement Loans						
Low	3	2.3	2.1	280	1.2	1.2
Moderate	6	4.6	5.2	665	2.8	2.7
Middle	15	11.5	13.0	1,296	5.5	7.9
Upper	87	66.9	70.3	13,855	58.3	74.1
Unknown	19	14.6	9.4	7,668	32.3	14.1
Total	130	100.0	100.0	23,764	100.0	100.0
Total Home Mortgage Loans						
Low	12	1.2	1.2	1,998	0.4	0.4
Moderate	44	4.2	6.1	9,874	1.8	2.6
Middle	106	10.2	13.7	26,196	4.9	7.56
Upper	668	64.0	66.9	317,786	59.1	69.6
Unknown	213	20.4	12.2	182,147	33.9	19.7
Total	1,043	100.0	100.0	538,001	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table F-5							
Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$ %	\$ %	
Other Purpose LOC							
Low	0	0.0	1.9	0	0.0	0.6	13.5
Moderate	1	1.7	2.3	362	3.6	1.3	15.6
Middle	6	10.2	11.6	1,017	10.1	4.0	18.1
Upper	46	78.0	79.1	7,496	74.8	78.8	52.9
Unknown	6	10.2	5.1	1,148	11.5	15.2	0.0
Total	59	100.0	100.0	10,023	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	3.0	1.1	250	1.9	0.1	13.5
Moderate	5	15.2	4.1	1,909	14.5	0.6	15.6
Middle	6	18.2	8.5	1,190	9.0	1.6	18.1
Upper	16	48.5	71.1	7,498	56.8	70.2	52.9
Unknown	5	15.2	15.2	2,343	17.8	27.5	0.0
Total	33	100.0	100.0	13,190	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	13.5
Moderate	0	0.0	0.0	0	0.0	0.0	15.6
Middle	0	0.0	0.0	0	0.0	0.0	18.1
Upper	0	0.0	0.0	0	0.0	0.0	52.9
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-6
Distribution of 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Mountain

	Bank And Aggregate Loans					Total Businesses	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	156	9.7	36.2	12,429	11.4	23.3	
Over \$1 Million	72	4.5		14,330	13.2		
Revenue Unknown	1,380	85.8		82,148	75.4		
Total	1,608	100.0		108,907	100.0		
By Loan Size							
\$100,000 or Less	1,323	82.3	87.7	31,801	29.2	36.0	
\$100,001 - \$250,000	185	11.5	7.8	30,445	28.0	23.2	
\$250,001 - \$1 Million	100	6.2	4.5	46,661	42.8	40.8	
Total	1,608	100.0	100.0	108,907	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	122	78.2		1,195	9.6		
\$100,001 - \$250,000	16	10.3		2,975	23.9		
\$250,001 - \$1 Million	18	11.5		8,259	66.4		
Total	156	100.0		12,429	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-7
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	115	25.4	29.6	56,971	21.9	24.4	33.6
Upper	337	74.6	70.4	203,443	78.1	75.6	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	452	100.0	100.0	260,414	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	73	27.7	30.6	27,703	19.7	20.1	33.6
Upper	191	72.3	69.4	112,627	80.3	79.9	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	264	100.0	100.0	140,330	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	31	25.6	30.0	3,013	24.3	18.4	33.6
Upper	90	74.4	70.0	9,395	75.7	81.6	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	121	100.0	100.0	12,408	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	47.6	5,861	100.0	23.9	24.6
Upper	0	0.0	52.4	0	0.0	76.1	75.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	5,861	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	239	26.4	30.0	96,546	22.5	21.9	33.6
Upper	668	73.6	70.0	332,449	77.5	78.1	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	907	100.0	100.0	428,995	100.0	100.0	100.0
<p>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table F-8
Distribution of 2019 Home Mortgage Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	22.0	29.1	679	10.8	16.7	33.6
Upper	32	78.0	70.9	5,594	89.2	83.3	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	41	100.0	100.0	6,273	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	33.3	28.3	2,319	62.5	13.1	33.6
Upper	18	66.7	71.7	1,390	37.5	86.9	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	3,709	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	10.4	0.0
Middle	0	0.0	30.9	0	0.0	22.6	33.6
Upper	0	0.0	69.1	0	0.0	77.4	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table F-9
Distribution of 2019 Small Business Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	78	27.6	27.1	10,750	32.0	30.5	34.7
Upper	205	72.4	60.0	22,832	68.0	62.6	65.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.9	0	0.0	6.9	
Total	283	100.0	100.0	33,582	100.0	100.0	100.0

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

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

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

Table F-10
Distribution of 2019 Home Mortgage Lending By Borrower Income Level
Assessment Area: Mountain

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	9	2.0	1.0	3,254	1.2	0.5	13.5
Moderate	24	5.3	6.2	5,087	2.0	2.5	15.6
Middle	28	6.2	12.9	7,518	2.9	6.9	18.1
Upper	263	58.2	67.4	136,169	52.3	71.7	52.9
Unknown	128	28.3	12.4	108,386	41.6	18.4	0.0
Total	452	100.0	100.0	260,414	100.0	100.0	100.0
Refinance Loans							
Low	5	1.9	1.6	876	0.6	0.5	13.5
Moderate	9	3.4	5.7	1,271	0.9	2.3	15.6
Middle	41	15.5	14.4	10,039	7.2	7.3	18.1
Upper	160	60.6	64.1	73,902	52.7	66.3	52.9
Unknown	49	18.6	14.3	54,242	38.7	23.6	0.0
Total	264	100.0	100.0	140,330	100.0	100.0	100.0
Home Improvement Loans							
Low	3	2.5	1.4	220	1.8	0.7	13.5
Moderate	7	5.8	5.6	714	5.8	2.5	15.6
Middle	14	11.6	13.2	1,050	8.5	7.8	18.1
Upper	82	67.8	73.7	8,296	66.9	69.6	52.9
Unknown	15	12.4	6.1	2,128	17.2	19.4	0.0
Total	121	100.0	100.0	12,408	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	19	2.1	1.3	4,480	1.1	0.6	13.5
Moderate	40	4.4	5.9	7,072	1.7	2.3	15.6
Middle	91	10.1	13.4	19,003	4.5	6.9	18.1
Upper	558	61.7	66.2	225,261	53.2	68.8	52.9
Unknown	197	21.8	13.2	167,318	39.5	21.4	0.0
Total	905	100.0	100.0	423,134	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table F-11 Distribution of 2019 Home Mortgage Lending By Borrower Income Level Assessment Area: Mountain							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	1	2.4	1.7	100	1.6	2.0	13.5
Moderate	0	0.0	6.6	0	0.0	2.5	15.6
Middle	2	4.9	12.5	250	4.0	5.5	18.1
Upper	34	82.9	73.5	4,048	64.5	83.0	52.9
Unknown	4	9.8	5.7	1,875	29.9	6.9	0.0
Total	41	100.0	100.0	6,273	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	3.7	3.6	30	0.8	1.7	13.5
Moderate	0	0.0	5.2	0	0.0	1.0	15.6
Middle	6	22.2	8.4	146	3.9	1.2	18.1
Upper	19	70.4	73.3	2,846	76.7	64.7	52.9
Unknown	1	3.7	9.6	687	18.5	31.3	0.0
Total	27	100.0	100.0	3,709	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	13.5
Moderate	0	0.0	0.0	0	0.0	0.0	15.6
Middle	0	0.0	0.0	0	0.0	0.0	18.1
Upper	0	0.0	5.3	0	0.0	7.0	52.9
Unknown	0	0.0	94.7	0	0.0	93.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2019 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-12
Distribution of 2019 Small Business Lending By Revenue Size of Businesses
Assessment Area: Mountain AA

	Bank And Aggregate Loans					Total Businesses %	
	Bank		Agg	Bank			
	#	#%	#%	\$(000)	\$%		
By Revenue							
\$1 Million or Less	174	61.5	50.4	11,651	34.7	41.7	
Over \$1 Million	96	33.9		19,578	58.3	8.2	
Revenue Unknown	13	4.6		2,353	7.0	1.2	
Total	283	100.0		33,582	100.0	100.0	
By Loan Size							
\$100,000 or Less	204	72.1	93.5	4,673	13.9	40.8	
\$100,001 - \$250,000	39	13.8	3.4	7,155	21.3	15.3	
\$250,001 - \$1 Million	40	14.1	3.1	21,754	64.8	44.0	
Total	283	100.0	100.0	33,582	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	147	84.5		1,806	15.5		
\$100,001 - \$250,000	13	7.5		2,205	18.9		
\$250,001 - \$1 Million	14	8.0		7,640	65.6		
Total	174	100.0		11,651	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-13
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	149	31.0	31.7	61,935	25.2	25.1	33.6
Upper	332	69.0	67.2	184,156	74.8	74.2	66.4
Unknown	0	0.0	1.1	0	0.0	0.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	481	100.0	100.0	246,091	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	41	22.9	30.8	11,800	17.6	19.3	33.6
Upper	138	77.1	68.8	55,103	82.4	80.4	66.4
Unknown	0	0.0	0.5	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	179	100.0	100.0	66,903	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	35	30.2	32.4	3,055	25.7	21.9	33.6
Upper	81	69.8	67.6	8,846	74.3	78.1	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	116	100.0	100.0	11,901	100.0	100.0	100.0
Multifamily Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	37.5	1,178	100.0	24.6	24.6
Upper	0	0.0	58.3	0	0.0	74.4	75.4
Unknown	0	0.0	4.2	0	0.0	1.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,178	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	251	29.7	31.5	81,938	24.4	22.9	33.6
Upper	593	70.3	67.7	253,413	75.6	76.6	66.4
Unknown	0	0.0	0.8	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	844	100.0	100.0	335,351	100.0	100.0	100.0
Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table F-14
Distribution of 2018 Home Mortgage Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	30.6	29.0	2,906	51.5	17.2	33.6
Upper	25	69.4	71.0	2,736	48.5	82.8	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	36	100.0	100.0	5,642	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	14	45.2	30.3	1,064	29.3	14.5	33.6
Upper	17	54.8	69.7	2,572	70.7	85.5	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	3,636	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	10.4	0.0
Middle	0	0.0	46.8	0	0.0	32.0	33.6
Upper	0	0.0	53.2	0	0.0	68.0	66.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>							

Table F-15
Distribution of 2018 Small Business Lending By Income Level of Geography
Assessment Area: Mountain

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	83	26.1	28.5	7,657	27.1	30.9	34.5
Upper	235	73.9	58.8	20,644	72.9	62.8	65.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.7	0	0.0	6.3	
Total	318	100.0	100.0	28,301	100.0	100.0	100.0

Source: 2018 FFIEC Census Data

2018 Dun & Bradstreet Data

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

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

Table F-16 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Mountain AA							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$ (000)	\$%	\$%	
Home Purchase Loans							
Low	10	2.1	1.3	2,030	0.8	0.5	13.5
Moderate	16	3.3	7.1	3,533	1.4	3.0	15.6
Middle	32	6.7	13.8	8,777	3.6	7.7	18.1
Upper	311	64.7	64.1	143,010	58.1	69.3	52.9
Unknown	112	23.3	13.6	88,741	36.1	19.5	0.0
Total	481	100.0	100.0	246,091	100.0	100.0	100.0
Refinance Loans							
Low	2	1.1	3.2	918	1.4	1.6	13.5
Moderate	17	9.5	8.5	3,111	4.7	3.6	15.6
Middle	16	8.9	16.8	2,894	4.3	9.2	18.1
Upper	109	60.9	58.3	38,330	57.3	60.6	52.9
Unknown	35	19.6	13.3	21,650	32.4	25.1	0.0
Total	179	100.0	100.0	66,903	100.0	100.0	100.0
Home Improvement Loans							
Low	2	1.7	2.4	33	0.3	1.7	13.5
Moderate	7	6.0	5.5	404	3.4	3.3	15.6
Middle	14	12.1	14.0	700	5.9	7.5	18.1
Upper	81	69.8	70.5	9,566	80.4	78.0	52.9
Unknown	12	10.3	7.6	1,198	10.1	9.5	0.0
Total	116	100.0	100.0	11,901	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	15	1.8	1.9	3,006	0.9	0.8	13.5
Moderate	47	5.6	7.2	7,472	2.2	3.0	15.6
Middle	68	8.1	14.4	13,201	4.0	7.8	18.1
Upper	547	64.9	63.0	196,336	58.8	66.4	52.9
Unknown	166	19.7	13.3	114,158	34.2	22.0	0.0
Total	843	100.0	100.0	334,173	100.0	100.0	100.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table F-17 Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: Mountain AA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	2.2	0	0.0	1.1	13.5
Moderate	0	0.0	3.7	0	0.0	0.6	15.6
Middle	1	2.8	12.2	250	4.4	4.5	18.1
Upper	30	83.3	76.2	3,603	63.9	81.7	52.9
Unknown	5	13.9	5.7	1,789	31.7	12.2	0.0
Total	36	100.0	100.0	5,642	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	3.2	2.1	25	0.7	0.3	13.5
Moderate	7	22.6	7.2	424	11.7	0.8	15.6
Middle	5	16.1	8.2	580	16.0	1.5	18.1
Upper	16	51.6	71.8	1,827	50.2	58.5	52.9
Unknown	2	6.5	10.8	780	21.5	38.9	0.0
Total	31	100.0	100.0	3,636	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.3	0	0.0	0.4	13.5
Moderate	0	0.0	1.3	0	0.0	0.0	15.6
Middle	0	0.0	5.2	0	0.0	0.0	18.1
Upper	0	0.0	7.8	0	0.0	3.4	52.9
Unknown	0	0.0	84.4	0	0.0	96.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i> <i>2011-2015 U.S. Census Bureau: American Community Survey</i> <i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Table F-18 Distribution of 2018 Small Business Lending By Revenue Size of Businesses Assessment Area: Mountain AA						
	Bank And Aggregate Loans					Total Businesses %
	Bank	Agg	Bank	Agg		
	#	#%	#%	\$(000)	\$%	\$%
By Revenue						
\$1 Million or Less	209	65.7	46.4	13,369	47.2	39.3
Over \$1 Million	91	28.6		13,041	46.1	
Revenue Unknown	18	5.7		1,891	6.7	
Total	318	100.0		28,301	100.0	
By Loan Size						
\$100,000 or Less	252	79.2	92.9	5,693	20.1	38.3
\$100,001 - \$250,000	33	10.4	3.5	6,071	21.5	15.4
\$250,001 - \$1 Million	33	10.4	3.5	16,537	58.4	46.4
Total	318	100.0	100.0	28,301	100.0	100.0
By Loan Size and Revenues \$1 Million or Less						
\$100,000 or Less	178	85.2		2,149	16.1	
\$100,001 - \$250,000	12	5.7		2,153	16.1	
\$250,001 - \$1 Million	19	9.1		9,067	67.8	
Total	209	100.0		13,369	100.0	

*Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey*

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

Table F-19 2020 Mountain AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,559	13.5
Moderate	0	0.0	0	0.0	0	0.0	6,422	15.6
Middle	14	35.9	15,376	37.3	1,488	9.7	7,441	18.1
Upper	25	64.1	25,830	62.7	1,336	5.2	21,784	52.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	41,206	100.0	2,824	6.9	41,206	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0	0.0	0	0.0	
Middle	38,764	14,265	33.6	36.8	8,916	23.0	15,583	40.2
Upper	80,045	28,230	66.4	35.3	13,039	16.3	38,776	48.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	118,809	42,495	100.0	35.8	21,955	18.5	54,359	45.8
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4,173	34.7	3,814	34.9	323	33.7	36	25.7
Upper	7,867	65.3	7,128	65.1	635	66.3	104	74.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,040	100.0	10,942	100.0	958	100.0	140	100.0
Percentage of Total Businesses:				90.9		8.0		1.2
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	138	46.2	136	46.4	1	25.0	1	50.0
Upper	161	53.8	157	53.6	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	299	100.0	293	100.0	4	100.0	2	100.0
Percentage of Total Farms:				98.0		1.3		0.7
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table F-20
2019 Mountain AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,559	13.5
Moderate	0	0.0	0	0.0	0	0.0	6,422	15.6
Middle	14	35.9	15,376	37.3	1,488	9.7	7,441	18.1
Upper	25	64.1	25,830	62.7	1,336	5.2	21,784	52.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	41,206	100.0	2,824	6.9	41,206	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	38,764	14,265	33.6	36.8	8,916	23.0	15,583	40.2
Upper	80,045	28,230	66.4	35.3	13,039	16.3	38,776	48.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	118,809	42,495	100.0	35.8	21,955	18.5	54,359	45.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4,184	34.7	3,805	34.8	341	34.7	38	26.6
Upper	7,869	65.3	7,121	65.2	643	65.3	105	73.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,053	100.0	10,926	100.0	984	100.0	143	100.0
Percentage of Total Businesses:				90.6		8.2		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	1	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	138	46.8	136	47.1	1	25.0	1	50.0
Upper	157	53.2	153	52.9	3	75.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	295	100.0	289	100.0	4	100.0	2	100.0
Percentage of Total Farms:				98.0		1.4		0.7
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table F-21
2018 Mountain AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,559	13.5
Moderate	0	0.0	0	0.0	0	0.0	6,422	15.6
Middle	14	35.9	15,376	37.3	1,488	9.7	7,441	18.1
Upper	25	64.1	25,830	62.7	1,336	5.2	21,784	52.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39	100.0	41,206	100.0	2,824	6.9	41,206	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0	0.0	0	0.0	
Middle	38,764	14,265	33.6	36.8	8,916	23.0	15,583	40.2
Upper	80,045	28,230	66.4	35.3	13,039	16.3	38,776	48.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	118,809	42,495	100.0	35.8	21,955	18.5	54,359	45.8
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4,587	34.5	4,142	34.4	371	35.2	74	34.9
Upper	8,713	65.5	7,891	65.6	684	64.8	138	65.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13,300	100.0	12,033	100.0	1,055	100.0	212	100.0
Percentage of Total Businesses:			90.5		7.9			1.6
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	-	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	146	47.7	144	47.7	1	50.0	1	50.0
Upper	160	52.3	158	52.3	1	50.0	1	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	306	100.0	302	100.0	2	100.0	2	100.0
Percentage of Total Farms:			98.7		0.7			0.7
<p>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

APPENDIX F

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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