



PUBLIC DISCLOSURE

September 23, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

ANB Bank
RSSD# 828651

3033 East 1st Avenue
Denver, Colorado 80206

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

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Outstanding**

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

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect excellent 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 good.
- 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 good.
- The bank is a leader in making community development (CD) loans.

Investment Test

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

Service Test

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

INSTITUTION

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Sturm Financial Group, Inc., Denver, Colorado.
- The bank had total assets of \$3.1 billion as of March 31, 2024.
- The bank operates 30 full-service locations throughout its 11 AAs including 23 branches in Colorado and 7 branches in Wyoming.
- Since the prior CRA evaluation, the bank has not facilitated any merger or acquisition activities, but it opened two branches in Colorado and closed one branch in Kansas.
 - In March 2022, the bank ceased operations in Kansas with the closure of its full-service branch in Lenexa, Kansas. This branch was previously included in a Kansas City Metropolitan AA.
 - In June 2023, the bank opened a full-service branch in Lakewood, Colorado, located within its Denver Metropolitan Statistical Area (MSA) AA.
 - In October 2023 in its Boulder MSA AA, the bank closed one full-service branch but opened another full-service branch at a different location.
- As shown in the loan portfolio table below, the bank's primary business focus is commercial lending to small- and medium-sized businesses, followed by residential real estate lending.

Table 1

Composition of Loan Portfolio as of March 31, 2024		
Loan Type	\$(000)	%
Construction and Land Development	159,281	8.9
Farmland	64,316	3.6
1- to 4-Family Residential Real Estate	511,361	28.7
Multifamily Residential Real Estate	112,041	6.3
Nonfarm Nonresidential Real Estate	500,300	28.0
Agricultural	6,517	0.4
Commercial and Industrial	184,215	10.3
Consumer	30,527	1.7
Other	215,095	12.1
Gross Loans	1,783,653	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its August 15, 2022, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's aforementioned 11 AAs. Full-scope analyses were conducted on the bank's Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA in Colorado; and the Cheyenne MSA AA and Northern Wyoming AA in Wyoming. The Fort Collins MSA AA, Grand Junction MSA AA, Boulder MSA AA, and San Miguel County AA in Colorado and the Casper MSA AA and Albany County AA in Wyoming were assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2022 and 2023 CRA LARs;
- CD loans originated from January 1, 2022 to December 31, 2023;
- Qualified investments that were made from January 1, 2022 to December 31, 2023, qualified investments made prior to, but still outstanding, during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2022 to December 31, 2023.

Table 2 illustrates the bank's presence in each AA by numbers of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2023 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

When determining the overall institutional rating, more weight was placed on the bank's performance in Colorado, followed by its performance in Wyoming, when considering loan volumes, deposit concentrations, and branch presence within each state. With respect to the lending analysis, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending. In addition, the evaluation of small farm lending carried limited weight in the overall rating due to overall low origination volume and was not evaluated as part of the geographic and borrower distribution analyses in any of the full-scope review AAs.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ ¹		Percent of Bank's Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Colorado		23	90.0	100.0	72.1	100.0	1.0	17 of 126
Denver MSA	Full	4	32.2	35.8	26.7	37.0	0.6	21 of 67
Colorado Springs MSA	Full	4	3.4	3.7	15.9	22.0	3.8	5 of 41
Fort Collins MSA	Limited	2	6.4	7.1	2.8	3.9	0.7	16 of 26
Grand Junction MSA	Limited	4	12.9	14.4	10.0	13.9	7.2	6 of 13
Boulder MSA	Limited	1	10.4	11.5	2.2	3.1	0.5	23 of 33
Mountain Colorado	Full	7	22.3	24.8	13.0	18.1	4.6	5 of 13
San Miguel County	Limited	1	2.3	2.5	1.5	2.1	7.3	4 of 6
State of Wyoming		7	10.0	100.0	27.9	100.0	3.51	10 of 45
Cheyenne MSA	Full	2	3.2	31.4	13.1	47.1	13.0	3 of 19
Casper MSA	Limited	1	1.4	13.5	1.9	6.7	1.8	9 of 9
Northern Wyoming	Full	3	2.7	26.8	4.6	16.7	2.4	13 of 16
Albany County	Limited	1	2.8	28.3	8.2	29.5	28.0	2 of 7
^{1.} Based on the bank's HMDA, small business, and small farm lending used in the analysis. ^{2.} Based on the June 30, 2023 FDIC's Deposit Market Share Report. ^{3.} Based on the bank's ranking among FDIC-insured financial institutions in each AA.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth analysis of the bank's record of lending, investment, and service activities in each state and specific AAs. Conclusions with respect to the lending test were evaluated for 2022 and 2023 lending data and are reflected in the body of the report while lending data for AAs that received a limited-scope review are located in Appendix E.

LENDING TEST

The bank's overall lending test performance is outstanding. This rating is derived from outstanding lending test performance in the state of Colorado, followed by high satisfactory lending test performance in the state of Wyoming. Additionally, the overall lending test conclusion was bolstered by the bank's leadership in its CD lending.

Regarding the geographic and borrower distribution analyses, individual home mortgage products such as home improvement and multifamily loans, as well as other purpose and purpose not applicable loans reported on the HMDA LARs, were not evaluated due to having insufficient volume for a meaningful analysis. As stated previously, small farm lending was also not evaluated for these analyses due to having insufficient volumes.

In addition, under the lending test, more consideration was given to the volume of loan originations rather than the dollar amount, as this represents the numbers of individuals or entities served. For the geographic and borrower distribution analyses, additional emphasis was also placed on the bank's performance in comparison to aggregate lending data, as it is considered representative of credit demand. Specifically, aggregate lending data is expected to incorporate many factors impacting lenders within an AA. Aggregate lending datasets are updated annually; however, only 2022 aggregate lending datasets were publicly available at the time of this examination. As a result, more emphasis was placed on the bank's 2022 small business lending performance. Thus, 2022 small business lending performance is discussed in more detail throughout the evaluation.

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 reflects excellent responsiveness to AA credit needs.

The bank's overall loan volumes since the prior evaluation reflect a considerable decline, particularly in its small business lending portfolio. This decline is primarily attributed to the sunset of the Small Business Administration's (SBA's) Paycheck Protection Program (PPP) deployment as a response to the Coronavirus Disease 2019 pandemic.

With regards to the distribution of lending among the bank's two-state AA footprint, approximately 70.8 percent of total lending (illustrated in Table 3) occurred within its Colorado AAs, while 22.0 percent of loans were originated within Wyoming AAs. The remaining 7.1 percent of lending occurred in areas beyond the boundaries of bank AAs.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2022 and 2023			
	#	\$(000)	#%	\$%
Home Improvement	91	8,185	8.7	1.3
Home Purchase	654	188,560	62.6	31.0
Multi-Family Housing	37	340,282	3.5	56.0
Refinancing	178	57,125	17.0	9.4
Other Purpose Closed-End	84	13,572	8.0	2.2
Total HMDA related	1,044	607,724	34.1	79.5
Small Business	1,929	147,744	62.9	19.3
Small Farm	93	8,966	3.0	1.2
TOTAL LOANS	3,066	764,434	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 a small dollar mortgage loan program that includes features such as no minimum loan amount, a reduced origination fee of \$100 for loan amounts less than \$500 thousand (M), no requirement for title insurance for loans under \$100M, and lower appraisal fees for loans under \$250M. This product is tailored to LMI borrowers with competitive loan rates and is generally not available through lenders on the secondary market. The bank also offers a mobile home lending product at comparable rates and fees to the bank's traditional mortgage products, apart from a 15-year term limit. The mobile home product is advantageous to borrowers located in rural communities, where demand for this product is often unmet by other lenders.

The bank continues to offer the Home Advantage Mortgage product, which combines any first mortgage product with a shorter-term, fully amortizing second mortgage at up to 90.0 percent loan-to-value. This allows a reduced down payment without the requirement for private mortgage insurance, allowing the borrower to build equity faster with a payment similar to a traditional mortgage. The bank charges no fees and pays for the borrower's appraisal. The Home Advantage product suite also provides attractive terms for deed-restricted properties and home improvements.

The bank also offers an unsecured Small Business Line of Credit with streamlined underwriting requirements, small dollar loan amounts, and recurring loans, which represent a common need for small businesses. The bank originated 702 loans in 2022 under this program, and 558 in 2023, of which over 88.0 percent were originated to small businesses, or those with revenues of less than \$1 million (MM). Additionally, the bank continues to offer SBA 7(a) and Program 504 loans, although at lesser volumes than its proprietary loan programs.

Finally, the bank also continues to participate as a portfolio lender in low-income housing tax credit (LIHTC) projects throughout its AA footprint. LIHTC loans are specifically for the purpose of funding affordable housing and include the issuance of tax credits, which include a complex underwriting process and require expertise in construction and development of LIHTC projects. At year-end 2023, the bank's portfolio commitment with regard to projects utilizing LIHTCs totaled more than \$310.0MM.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. The bank originated a substantial majority of loans, by number and dollar volume, inside its AAs. As illustrated in Table 4, a substantial majority of the bank's small business and home mortgage-related loans were originated inside bank AAs, followed by an adequate percentage of small farm loans.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Improvement	90	98.9	8,115	99.1	1	1.1	70	0.9
Home Purchase - Conventional	599	91.6	177,510	94.1	55	8.4	11,050	5.9
Multi-Family Housing	32	86.5	314,806	92.5	5	13.5	25,476	7.5
Other Purpose Closed-End	79	94.0	12,622	93	5	6.0	950	7.0
Refinancing	151	84.8	53,369	93.4	27	15.2	3,756	6.6
Total HMDA related	951	91.1	566,422	93.2	93	8.9	41,302	6.8
Small Business	1,833	95.0	138,515	93.8	96	5.0	9,229	6.2
Small Farm	63	67.7	5,374	59.9	30	32.3	3,592	40.1
TOTAL LOANS	2,847	92.9	710,311	92.9	219	7.1	54,123	7.1
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects good penetration among the different census tracts and dispersion throughout its AAs, which is consistent with the geographic distribution of lending in the states of Colorado and Wyoming.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall good penetration among individuals of different income levels and businesses of different sizes, which is consistent with the borrower distribution of lending in the states of Colorado and Wyoming.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending throughout its AAs. Overall, the bank is a leader in making CD loans. The bank is a leader in making CD loans in Colorado, while it makes an adequate level of CD loans in the state of Wyoming. As illustrated in Table 5, the bank originated 58 CD loans totaling \$273.3MM during the evaluation period. A significant subset of loans were responsive to affordable housing needs, which has helped meet critical credit needs in many of the bank's operational areas, including in recreational and resort mountain communities that contain higher housing costs. As illustrated in Table 5, the bank also made one qualified CD loan totaling \$201.0M that also supported affordable housing needs in the bank's previously delineated Kansas City Metropolitan AA.

Given the significant volume of CD lending with respect to the bank's lending, deposits, and branching presence in each AA, and the availability and opportunity of such loans throughout the bank's AAs, this performance resulted in a positive impact to the overall lending test rating.

Examples of responsive CD lending activities throughout the bank's AAs include:

- The bank participated in a LIHTC project within its Denver MSA AA, providing \$26.0MM in financing for the construction of a multifamily affordable housing complex. The housing facility targets LMI individuals who are at-risk of homelessness or experiencing homelessness, and also provides on-site family-support services for residents, including childcare.
- The bank originated two loans totaling \$10.0MM to a small manufacturing business in a rural, underserved portion of the bank's Northern Wyoming AA, providing jobs to LMI wage-earners.
- The bank provided \$2.0MM in financing to support construction of an organization in the Colorado Springs MSA AA that provides an array of community services and programs for LMI individuals, including career development resources for individuals with disabilities who often experience barriers to employment.

Table 5

Community Development Loans – All		
Community Development Purpose	#	\$(000)
Affordable Housing	37	252,851
Community Services	9	4,000
Economic Development	8	16,146
Revitalization and Stabilization	3	90
Outside Activities	1	201
Total Loans	58	273,289

INVESTMENT TEST

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

The bank's overall performance under the investment test is 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 excellent responsiveness to the credit and CD needs of its AAs. The majority of qualified investments are comprised of mortgage-backed securities (MBS) pools that support affordable housing by providing home loans to LMI individuals and families. The remaining investments are comprised of a mixture of municipal bonds for the benefit of schools where the majority of student population is eligible for free or reduced lunches, or which benefit the revitalization and stabilization of areas demonstrating such needs.

Table 6 illustrates the itemization of prior period investments which remain on the bank's portfolio, as well as investment activity which occurred in the current evaluation period, followed by the bank's philanthropic donation activities. Examples of qualifying CD investments include:

- The bank owns 71 pools of qualified MBS totaling \$66.0MM from prior-review periods that contain mortgages originated to LMI individuals and which remain on the bank's investment portfolio. In the individual AA analyses, the concentrations of MBS's were allocated to the respective AAs in which the mortgage borrowers reside.
- During the evaluation period, the bank made an investment totaling \$1.0MM for the benefit of a large area school district for construction, renovations, and improvements of schools within a district that contains a student population in which the majority is eligible for free or reduced lunches under the National School Lunch Program (NSLP).

- In addition to activities which occurred within bank AAs, the bank presented 15 investments totaling \$11.6MM which remain in the bank's portfolio from its previous operations in the state of Kansas. The investments were comprised of 14 pools of affordable housing-related MBS totaling \$10.7MM and a school bond totaling \$846M for improvements to a Kansas City-area school that contains a majority student population eligible for free or reduced lunches.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	175	55,294	0	0	45	81	220	55,375
Community Services	22	13,695	1	1,021	196	348	219	15,063
Economic Development	0	0	0	0	27	50	27	50
Revitalization and Stabilization	41	5,775	0	0	2	5	43	5,780
Outside Activities	15	11,577	0	0	0	0	15	11,577
Total	256	87,488	1	1,021	270	484	527	88,993
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

In addition to its qualified debt and equity investment activities, the bank also made a significant volume of CD donations throughout its AAs. The bank's donation activity was particularly responsive to nonprofits and area agencies that provide community services targeted to LMI individuals and families, as well as organizations that provide services in support of addressing affordable housing needs. Examples of responsive philanthropic activities include:

- The bank made three donations totaling \$37.5M to an area nonprofit organization that provides an array of community services to LMI individuals, with the primary impact consisting of individuals with disabilities or barriers procuring sustainable employment.
- The bank made 18 donations totaling \$48.0M throughout its AAs to local chapters of an organization that provides critical resources for the benefit of affordable housing needs, including access to safe housing for LMI individuals and families, home repair grants, and homeownership education.

SERVICE TEST

The bank's overall performance under the service test is outstanding. This rating is consistent with the service test performance in the states of Colorado and Wyoming.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification.

Branch locations and alternative delivery systems, such as drive-thru facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Table 7 illustrates the distribution of bank offices and 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. As illustrated in the table, the bank's branch and ATM network align similarly to the AA demographic figures.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. As previously discussed, the bank exited the Kansas City Metropolitan area since the prior evaluation, which included one full-service branch closure in an upper-income tract in Lenexa, Kansas. A full-service branch was opened in Lakewood, Colorado, in the bank's Denver MSA AA, located in a middle-income tract. Additionally, the bank opened a full-service branch in Boulder, Colorado, in the bank's Boulder MSA AA, in an upper-income tract to replace a closed branch located in a moderate-income tract approximately a mile west of its new branch office. Given the minimal distance between branches, and with no changes in service offerings or operational accessibility, the relocation did not adversely impact the bank's service-delivery systems, particularly to LMI areas or individuals.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours at all branches are generally from 9:00 a.m. to 5:00 p.m. on Monday through Friday. Additionally, most branches offer drive-thru services from 8:30 a.m. to 5:30 p.m., Monday through Friday, with no weekend hours. The bank maintains cash dispensing-only ATMs at each banking office.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.3	23.3	46.7	23.3	3.3	100.0	3.9	23.8	41.0	29.1	2.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.3	23.3	46.7	23.3	3.3	100.0	3.6	24.4	41.9	29.2	1.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	30		2		2		0	(1)	1	0	0	1
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	41		139		31		2		213		97	
^{1.} Based on 2023 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. As illustrated in Table 7, bank officers and staff provided 213 qualified services to 97 different organizations, donating 3,669 hours of their time during the evaluation period. Services provided include serving on boards of directors (boards) of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, economic development organizations that advise and cater to small business incubation and development, and local organizations that serve to revitalize and stabilize distressed and/or underserved areas. Other staff serve on committees that provide technical assistance on financial matters, financial literacy education to first-time homebuyers, or assist with marketing and fundraising efforts for essential community support organizations. Examples of CD services provided throughout the bank's AAs include:

- Bank staff supported 31 CD services across the bank's various AAs through a nationally recognized organization that provides resources and academic support for school-aged youth. The beneficiaries of the services were from schools with a student population of which the majority are eligible for free or reduced lunches under the NSLP.
- A member of the bank's leadership team served on the board of an area nonprofit organization that provides critical community service needs to individuals and families experiencing homelessness and/or food insecurity. The bank representative provided their financial expertise through service on financial and executive committees for the organization and contributing 144 hours in service to the organization.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

STATE OF COLORADO

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

Major factors supporting the rating include:

Lending Test

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

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits excellent responsiveness to the credit and CD needs throughout its 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 branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Colorado AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution. Full-scope reviews were conducted for the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA. The overall state rating was predominantly based on the bank's performance in the Denver MSA AA and the Mountain Colorado AA based on the higher volumes of loans in these markets. Limited-scope reviews were conducted for the Grand Junction MSA AA, Fort Collins MSA AA, Boulder MSA AA, and the San Miguel County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates 7 of its 11 AAs and operates 23 of its 30 branches in the state of Colorado. The bank's AAs include several major metropolitan areas along the Front Range of Colorado, as well as the Interstate-70 corridor through the Rocky Mountains, and the largest metropolitan area on the Western Slope, the Grand Junction MSA. The AAs also include a rural county on the Western Slope in the southwestern portion of the state.

The loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of the report, with a primary emphasis on commercial and residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the lending test in the state of Colorado is outstanding. Bank performance under the lending test in the Denver MSA AA and the Colorado Springs MSA AA was excellent, followed by good lending test performance in the Mountain Colorado AA. The lending test ratings for the Denver MSA AA and the Colorado Springs MSA AA were bolstered by the bank's leadership position in originating CD loans in these two areas.

Additionally, and consistent with the bank's institutional strategy, small business lending performance carried greater weight in the overall determination of performance through the full-scope AA evaluations, followed by the bank's home mortgage lending performance.

Lending Activity

The bank's overall lending activities in the state of Colorado reflect excellent responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Refer to the Institution section of the report for a detailed description of the bank's flexible and innovative lending programs.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Colorado reflects good distribution among the different census tracts and dispersion throughout the AAs. The distribution of loans across different geographies is good in the Denver MSA AA and the Colorado Springs MSA AA, and adequate in the Mountain Colorado AA. It is noted that the Mountain Colorado AA contains only one moderate-income tract located in the rural town of Avon (Eagle County) and is otherwise predominately comprised of middle- and upper-income census tracts; as such, limited weight was applied to the geographic distribution test in this AA.

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

The bank's lending within Colorado has an overall good penetration among individuals of different income levels and businesses of different sizes. The borrower distribution of loans reflects good penetration in the Denver MSA AA and the Colorado Springs MSA AA, and excellent penetration in the Mountain Colorado AA.

Community Development Lending

The bank is a leader in providing CD loans within the state of Colorado. The bank originated 47 CD loans totaling \$261.1MM in AAs within the state, which comprises 81.0 percent of overall bank-wide CD loan volume by number and 95.6 percent by dollar volume. The bank was a leader in CD loan originations in the Denver MSA and Colorado Springs MSA AAs, while the bank originated an adequate level of CD loans in the Mountain Colorado AA. As illustrated in Table 8, the bank's CD lending was particularly responsive to area affordable housing needs, which is a critical challenge in many of the bank's operating areas that contain high housing costs.

Table 8

Community Development Loans – State of Colorado		
Community Development Purpose	#	\$(000)
Affordable Housing	34	229,351
Community Services	5	2,750
Economic Development	5	5,551
Revitalization and Stabilization	0	0
Outside Activities	3	23,500
Total Loans	47	261,153

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Colorado is outstanding.

The bank has an excellent level of qualified CD investments and grants within Colorado and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs.

In the state of Colorado, the bank presented 57 of the 71 qualified MBS pools that remain on its investment portfolio from prior periods. These investments supported 110 concentrations of mortgages totaling \$46.0MM across its seven Colorado AAs and were allocated to each respective AA in the individual AA analyses. The pools were responsive to area affordable housing needs by providing home mortgage loans to LMI individuals.

Additionally, the bank presented 10 qualified prior period and one current period bond(s) which benefit the community service needs of Colorado schools that contain a majority student population eligible for free or reduced lunches under the NSLP. An additional three municipal bonds that remain on the bank's portfolio were qualified for the benefit of a school district outside of the bank's current AA footprint which contains a majority student population eligible for free or reduced lunches.

To further demonstrate its commitment to meeting critical AA needs, the bank's philanthropic donation activities totaled \$329.0M and were distributed to 96 Colorado organizations during the evaluation period. As illustrated in Table 9, a substantial portion of donations were made to organizations that provide community services to LMI individuals and families.

Table 9

Investments, Grants, and Donations – State of Colorado								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	110	46,328	0	0	38	72	148	46,399
Community Services	7	5,235	1	1,021	113	228	121	6,483
Economic Development	0	0	0	0	9	24	9	24
Revitalization and Stabilization	0	0	0	0	2	5	2	5
Outside Activities	3	1,148	0	0	0	0	3	1,148
Total	120	52,710	1	1,021	162	329	283	54,060
^{1.} Book Value of Investment ^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's overall performance under the service test in the state of Colorado is outstanding. Bank performance under the service test in the Denver MSA AA, Colorado Springs MSA AA, and Mountain Colorado AA is considered excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru facilities and online and mobile banking, within Colorado are accessible overall to the bank's various geographies and to individuals of different income levels in each AA. The Denver MSA AA has only four banking offices, including the main office, that serve a very large geographic area and are reasonably accessible, while the Mountain Colorado and Colorado Springs AAs include seven and four branch locations, respectively, that are accessible to various geographies and individuals of different income levels.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. As noted in the overall Retail Banking Services section of this report, since the prior evaluation, a full-service branch was opened in Lakewood, Colorado, in the Denver MSA AA, located in a middle-income tract. Additionally, the bank opened a full-service branch in Boulder, Colorado, in an upper-income tract in the Boulder MSA AA, to replace a closed branch located in a moderate-income tract approximately a mile west of its new branch office. Given the minimal distance between branches, and with no changes in service offerings or operational accessibility, the relocation did not adversely impact the bank's service-delivery systems, particularly to LMI areas or individuals.

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

Table 10

Retail Banking and Community Development Services – State of Colorado												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.4	21.7	39.1	30.4	4.4	100.0	4.2	23.9	39.5	30.2	2.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.3	21.7	39.1	30.4	4.3	100.0	3.9	24.7	40.2	30.2	1.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	23		2		1		0	(1)	1	1	0	1
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	33		109		19		2		163		79	
¹ Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services within the state of Colorado. Bank officers and staff provided 163 services and donated more than 2,600 hours to 79 organizations throughout its Colorado AAs. Many of these activities included membership on the boards for various affordable housing and community service organizations, as well as serving on fundraising and marketing committees or presenting at seminars for first-time homebuyers and small business entrepreneurs.

**DENVER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Denver MSA AA consists of Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties in their entirety, which comprise the entire Denver, Colorado MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA delineation since the prior CRA evaluation.
- The AA is comprised of 707 total census tracts, including 37 low-, 179 moderate-, 258 middle-, 214 upper-, and 19 unknown-income census tracts. This differs from the tract composition at the prior evaluation, as the AA had 51 low-, 150 moderate-, 205 middle-, 207 upper-, and 8 unknown-income census tracts.
- The bank operates 4 of its 30 banking offices in the AA, including its headquarters in the Cherry Creek district of Denver, located in an unknown-income tract. Since the last evaluation, the bank opened a full-service branch in Lakewood, located in a middle-income tract, while the bank's remaining two banking offices are located in upper-income tracts. Each banking office contains an on-site ATM.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank holds 0.6 percent market share, ranking 21st of 67 FDIC-insured depository institutions operating from 587 offices in the AA.
- One community contact recently conducted as part of the CRA evaluation for another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspective on local economic conditions. The contact represented an economic development organization operating in the Denver area and worked directly with organizations and individuals requiring financing.

Table 11

Population Change Assessment Area: Denver MSA			
Area	2015 Population	2020 Population	Percent Change
Denver MSA	2,703,972	2,963,821	9.6
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Broomfield County, CO	60,699	74,112	22.1
Clear Creek County, CO	9,136	9,397	2.9
Denver County, CO	649,654	715,522	10.1
Douglas County, CO	306,974	357,978	16.6
Elbert County, CO	23,855	26,062	9.3
Gilpin County, CO	5,605	5,808	3.6
Jefferson County, CO	552,344	582,910	5.5
Park County, CO	16,189	17,390	7.4
Colorado	5,278,906	5,773,714	9.4
Source: 2011 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- As noted in table 11, the Denver MSA AA includes over half the population of the state of Colorado and experienced significant growth from 2015 to 2020, particularly in Broomfield and Douglas Counties.

Table 12

Median Family Income Change Assessment Area: Denver MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Denver MSA	88,302	103,157	16.8
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Broomfield County, CO	106,948	129,207	20.8
Clear Creek County, CO	94,577	109,327	15.6
Denver County, CO	76,243	93,236	22.3
Douglas County, CO	125,984	137,589	9.2
Elbert County, CO	105,472	115,382	9.4
Gilpin County, CO	82,701	111,832	35.2
Jefferson County, CO	94,579	108,867	15.1
Park County, CO	75,643	90,338	19.4
Colorado	81,753	92,752	13.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Median family incomes (MFIs) varied significantly among the ten AA counties, ranging from \$83,853 in Adams County to \$137,589 in Douglas County, suggesting widely diverse and varying economic conditions across the AA.
- For the Denver MSA AA, the MFI change between 2015 and 2020 at 16.8 percent greatly outpaced that of the prior 5-year period, between 2010 and 2015, which reflected an MFI decrease of 1.2 percent.
- The percentage of families below the poverty level in the AA at 5.3 percent was below the statewide figure of 6.1 percent. Denver and Adams Counties had the highest poverty rates in the AA, at 8.4 and 7.4 percent, respectively.
- A member of the community noted that across the state of Colorado, nearly 40 percent of lower-income households have struggled more financially as of 2023.

Table 13

Housing Cost Burden Assessment Area: Denver MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver MSA	81.0	49.5	46.2	65.3	37.3	21.0
Adams County, CO	83.3	44.4	50.7	66.2	35.1	24.0
Arapahoe County, CO	84.3	52.2	49.2	67.4	37.8	21.7
Broomfield County, CO	83.8	72.0	41.9	56.1	38.5	16.7
Clear Creek County, CO	66.3	30.6	42.5	45.1	38.6	23.5
Denver County, CO	76.6	44.7	42.9	65.9	34.6	21.9
Douglas County, CO	89.1	71.3	43.1	73.3	49.5	18.9
Elbert County, CO	38.2	22.2	22.6	72.1	42.8	25.5
Gilpin County, CO	87.5	17.1	32.9	76.8	36.5	24.9
Jefferson County, CO	83.1	50.3	47.8	60.2	36.7	18.8
Park County, CO	71.1	65.0	52.8	51.7	30.5	19.9
Colorado	79.7	47.9	46.5	63.2	37.3	21.4
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- Housing affordability for renters and homeowners is constrained throughout the MSA counties, with the greatest cost burden to low-income renters and low-income homeowners in Douglas and Gilpin Counties.
- According to 2020 Census data, the housing affordability ratio¹ in the AA of 20.1 percent is comparable to the ratio for the state of Colorado at 20.3 percent; however, this ratio for both the AA and state has decreased since 2015, indicating a continued decline in affordability.

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

Table 14

Unemployment Rates Assessment Area: Denver MSA					
Area	2018	2019	2020	2021	2022
Denver MSA	2.9	2.6	7.0	5.5	3.0
Adams County, CO	3.2	2.8	7.5	6.2	3.4
Arapahoe County, CO	3.0	2.6	7.3	5.8	3.1
Broomfield County, CO	2.7	2.4	6.1	4.6	2.6
Clear Creek County, CO	2.8	2.4	8.1	5.5	2.9
Denver County, CO	2.9	2.6	7.6	5.9	3.1
Douglas County, CO	2.6	2.3	5.3	4.1	2.5
Elbert County, CO	2.6	2.1	4.3	3.9	2.4
Gilpin County, CO	2.4	2.2	10.8	6.1	2.7
Jefferson County, CO	2.8	2.5	6.6	5.1	2.8
Park County, CO	2.6	2.4	5.4	4.2	2.6
Colorado	3.0	2.7	6.8	5.4	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- In 2022, unemployment rates in the AA counties began to decline and return to pre-pandemic levels after pandemic-driven spikes were observed in 2020 and 2021.
- However, a member of the community noted there are 22 percent fewer small businesses operating across Colorado as a result of the pandemic.
- Aside from state and federal government and various university and public-school systems, major employers in the Denver MSA AA include Denver International Airport, University of Colorado Health, Amazon, HealthONE Corporation, Centura Health, Intermountain Healthcare, and Lockheed Martin Corporation.

Table 15

Home Mortgage Loan Trends Assessment Area: Denver MSA					
Area	2018	2019	2020	2021	2022
Denver MSA	101,842	145,410	245,749	215,066	86,316
Adams County, CO	18,021	25,031	38,202	35,698	15,806
Arapahoe County, CO	22,318	31,573	51,502	45,811	18,151
Broomfield County, CO	2,197	3,408	6,159	5,200	1,878
Clear Creek County, CO	418	523	823	866	375
Denver County, CO	21,360	29,847	50,892	44,145	17,970
Douglas County, CO	14,929	22,986	41,905	35,027	13,726
Elbert County, CO	1,170	1,852	3,051	2,703	1,199
Gilpin County, CO	244	327	536	603	227
Jefferson County, CO	20,172	28,501	50,464	42,757	16,063
Park County, CO	1,013	1,362	2,215	2,256	921
Colorado	190,332	267,259	449,942	405,440	170,879
Source: FFIEC Home Mortgage Disclosure Act Aggregate Data					

- As noted in Table 15, home mortgage loans applications and originations within the MSA and the state of Colorado significantly decreased starting in 2022, indicating a lower demand for home mortgage loans within the review period. This aligns with a broader trend nationwide and correlates with increasing mortgage rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER MSA AA

LENDING TEST

The bank's performance under the lending test in the Denver MSA AA is excellent and was bolstered by the bank's leadership in originating CD loans. Regarding the geographic and borrower distribution analyses for home mortgage lending, home refinance, home improvement and multifamily loans were not evaluated at the individual product level due to having insufficient volumes for a meaningful analysis.

Lending Activity

The bank's lending activities reflect excellent responsiveness to AA credit needs. The evaluation of lending in this AA included 397 small business and 148 home mortgage loans originated between January 1, 2022 and December 31, 2023.

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

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage loans reflects excellent penetration throughout the AA, while lending to small businesses based on geography reflects adequate penetration levels.

An analysis of lending patterns throughout the expansive AA revealed gaps and/or lapses in the dispersion of small business and home mortgage loans, particularly with regards to dispersion among AA LMI tracts; however, a review of lending patterns and the proximity of lending with regard to branch accessibility did not reveal concerns and were explained by reasonable performance context. Specifically, the AA contains a total of 707 census tracts, including 37 low- and 179 moderate-income tracts, as well as LMI areas within the AA that are greater than 30 miles from the nearest ANB banking office. The bank's core branch distribution was considered reasonably accessible to the AA's geographies and individuals, which further validated that the dispersion of bank lending reveals no problematic gaps or lapses in lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans in low-income tracts was significantly above the aggregate lending data and the percentage of owner-occupied housing units in the AA (demographic

figure). Lending penetration in moderate-income tracts reflected a distribution of loans that was above the aggregate lending data and the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected penetration levels consistent with 2023 lending patterns.

A conspicuous gap or lapse was identified that includes LMI tracts but is explained by performance context.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The distribution of 2023 home purchase loans among low-income tracts was significantly above aggregate lending data and the demographic figure. Lending in moderate-income tracts was also significantly above the aggregate lending data and the demographic figure.

The bank's home purchase lending in 2022 reflected penetration levels consistent with 2023 lending patterns.

A conspicuous gap or lapse was identified that includes LMI tracts but is explained by performance context.

Table 16

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Denver MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	8	17.8	2.8	1,074	7.8	1.9	12	24.0	2.8	1,167	7.1	1.9	2.8
Moderate	16	35.6	21.0	2,554	18.5	15.8	18	36.0	23.3	1,890	11.6	17.9	21.2
Middle	13	28.9	36.6	5,917	42.9	34.3	10	20.0	36.6	4,587	28.1	34.7	37.6
Upper	8	17.8	39.0	4,253	30.8	47.1	10	20.0	36.7	8,686	53.2	44.9	37.9
Unknown	0	0.0	0.6	0	0.0	0.8	0	0.0	0.5	0	0.0	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	13,798	100.0	100.0	50	100.0	100.0	16,330	100.0	100.0	100.0
Refinance Loans													
Low	1	6.7	2.8	56	1.1	2.0	0	0.0	2.7	0	0.0	1.4	2.8
Moderate	1	6.7	22.7	345	6.5	17.5	1	14.3	22.6	90	11.3	17.2	21.2
Middle	3	20.0	37.5	1,450	27.3	34.4	2	28.6	36.4	151	19.0	40.3	37.6
Upper	10	66.7	36.4	3,451	65.1	45.5	4	57.1	37.8	552	69.6	40.8	37.9
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.4	0	0.0	0.3	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	5,302	100.0	100.0	7	100.0	100.0	793	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.7	0	0.0	1.4	0	0.0	1.8	0	0.0	1.2	2.8
Moderate	0	0.0	14.7	0	0.0	10.9	2	33.3	16.6	350	64.8	11.9	21.2
Middle	1	50.0	35.4	368	88.0	30.9	4	66.7	37.9	190	35.2	33.1	37.6
Upper	1	50.0	47.7	50	12.0	56.4	0	0.0	43.2	0	0.0	53.1	37.9
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.4	0	0.0	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	418	100.0	100.0	6	100.0	100.0	540	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	3	50.0	12.6	30,159	61.0	11.1	4	50.0	14.7	67,000	69.0	8.3	8.1
Moderate	2	33.3	30.9	16,000	32.4	29.4	1	12.5	29.8	20,500	21.1	24.9	35.1
Middle	1	16.7	35.5	3,257	6.6	41.6	2	25.0	37.2	6,475	6.7	47.6	33.8
Upper	0	0.0	18.3	0	0.0	16.9	1	12.5	16.5	3,150	3.2	14.2	20.4
Unknown	0	0.0	2.6	0	0.0	1.0	0	0.0	1.8	0	0.0	4.9	2.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	49,416	100.0	100.0	8	100.0	100.0	97,125	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	13	17.8	2.7	31,349	44.8	2.6	16	21.3	2.7	68,167	59.2	2.3	2.8
Moderate	20	27.4	20.4	18,950	27.1	17.0	22	29.3	22.0	22,830	19.8	18.0	21.2
Middle	19	26.0	36.6	11,142	15.9	34.6	19	25.3	36.7	11,443	9.9	36.4	37.6
Upper	21	28.8	39.8	8,566	12.2	45.1	18	24.0	38.2	12,709	11.0	42.4	37.9
Unknown	0	0.0	0.5	0	0.0	0.8	0	0.0	0.5	0	0.0	0.9	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	73	100.0	100.0	70,007	100.0	100.0	75	100.0	100.0	115,149	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of loans in 2022 among low-income tracts was significantly above the aggregate lending data and the demographic figure of total businesses. Lending among moderate-income tracts was below the aggregate lending data as well as the demographic figure.

The distribution of small business loans in 2023 reflected overall consistent lending performance to that of 2022 lending performance, although penetration was generally comparable to aggregate lending data and demographic figures among LMI tracts.

Table 17

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Denver MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	30	13.8	4.5	5,123	21.9	6.0	4	2.2	253	1.2	4.1
Moderate	22	10.1	22.2	3,779	16.2	24.9	41	22.9	2,966	14.5	21.2
Middle	63	28.9	32.6	3,676	15.7	29.6	49	27.4	3,276	16.0	34.4
Upper	95	43.6	37.6	9,570	41.0	34.7	74	41.3	11,103	54.2	37.5
Unknown	8	3.7	2.6	1,220	5.2	4.6	11	6.1	2,884	14.1	2.7
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	218	100.0	100.0	23,368	100.0	100.0	179	100.0	20,482	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

The bank's lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage lending reflects excellent penetration levels while small business lending reflects adequate penetration.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans to low-income borrowers was significantly above the aggregate lending data and comparable to the percentage of low-income families in the AA (demographic figure). Lending to moderate-income borrowers was also significantly above the aggregate lending data, as well as significantly above the demographic figure. The distribution of home mortgage lending in 2022 was below the excellent penetration levels noted in 2023 lending; however, bank performance was generally above the aggregate lending data and the demographic figure.

Home Purchase Loans

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

The borrower distribution of home purchase lending in 2022 reflected consistent penetration levels with the performance noted in 2023 lending.

Table 18

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Denver MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	7	15.6	4.1	866	6.3	1.8	11	22.0	3.7	947	5.8	1.5	20.2
Moderate	13	28.9	17.3	1,222	8.9	11.7	18	36.0	16.8	1,566	9.6	11.2	18.2
Middle	5	11.1	24.3	775	5.6	21.7	7	14.0	25.1	1,120	6.9	22.2	21.9
Upper	11	24.4	38.6	6,204	45.0	48.6	7	14.0	36.3	7,774	47.6	46.7	39.7
Unknown	9	20.0	15.8	4,731	34.3	16.3	7	14.0	18.1	4,923	30.1	18.4	0.0
Total	45	100.0	100.0	13,798	100.0	100.0	50	100.0	100.0	16,330	100.0	100.0	100.0
Refinance Loans													
Low	2	13.3	14.5	106	2.0	8.9	2	28.6	11.4	81	10.2	4.8	20.2
Moderate	2	13.3	22.0	218	4.1	17.7	0	0.0	20.9	0	0.0	10.7	18.2
Middle	3	20.0	21.0	1,010	19.0	20.2	1	14.3	22.1	60	7.6	13.4	21.9
Upper	6	40.0	27.8	3,485	65.7	36.7	1	14.3	31.5	200	25.2	27.8	39.7
Unknown	2	13.3	14.8	483	9.1	16.5	3	42.9	14.0	452	57.0	43.4	0.0
Total	15	100.0	100.0	5,302	100.0	100.0	7	100.0	100.0	793	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.7	0	0.0	3.9	0	0.0	6.6	0	0.0	3.5	20.2
Moderate	0	0.0	15.7	0	0.0	9.9	2	33.3	18.4	90	16.7	11.4	18.2
Middle	0	0.0	25.3	0	0.0	20.0	0	0.0	25.6	0	0.0	20.7	21.9
Upper	0	0.0	50.5	0	0.0	62.5	3	50.0	45.8	385	71.3	60.1	39.7
Unknown	2	100.0	2.8	418	100.0	3.8	1	16.7	3.7	65	12.0	4.3	0.0
Total	2	100.0	100.0	418	100.0	100.0	6	100.0	100.0	540	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	10	14.9	7.6	1,122	5.4	3.9	13	19.4	5.7	1,028	5.7	2.2	20.2
Moderate	16	23.9	18.6	1,500	7.3	13.2	20	29.9	18.0	1,656	9.2	11.1	18.2
Middle	9	13.4	23.4	1,836	8.9	21.0	9	13.4	24.7	1,200	6.7	20.6	21.9
Upper	19	28.4	37.3	10,501	51.0	46.3	14	20.9	36.9	8,700	48.3	44.4	39.7
Unknown	13	19.4	13.1	5,632	27.4	15.6	11	16.4	14.7	5,440	30.2	21.7	0.0
Total	67	100.0	100.0	20,591	100.0	100.0	67	100.0	100.0	18,024	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of loans originated in 2022 to businesses with annual revenues of \$1MM or less (small businesses) reflected penetration levels which were comparable to the aggregate lending data and below the demographic figure.

The distribution of small business loans in 2023 reflected consistent performance with 2022 lending patterns.

Table 19

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Denver MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	130	59.6	54.2	4,243	18.2	33.6	111	62.0	1,281	6.3	92.9
Over \$1 Million	85	39.0		17,775	76.1		66	36.9	18,301	89.4	6.1
Revenue Unknown	3	1.4		1,350	5.8		2	1.1	900	4.4	1.0
Total	218	100.0		23,368	100.0		179	100.0	20,482	100.0	100.0
By Loan Size											
\$100,000 or Less	177	81.2	95.1	2,254	9.6	42.0	140	78.2	1,984	9.7	
\$100,001 - \$250,000	14	6.4	2.5	2,721	11.6	13.3	10	5.6	1,819	8.9	
\$250,001 - \$1 Million	27	12.4	2.4	18,393	78.7	44.8	29	16.2	16,679	81.4	
Total	218	100.0	100.0	23,368	100.0	100.0	179	100.0	20,482	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	123	94.6		699	16.5		108	97.3	431	33.6	
\$100,001 - \$250,000	2	1.5		386	9.1		2	1.8	315	24.6	
\$250,001 - \$1 Million	5	3.8		3,158	74.4		1	0.9	535	41.8	
Total	130	100.0		4,243	100.0		111	100.0	1,281	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 17 CD loans totaling \$129.9MM in this AA, which were highly responsive to affordable housing needs. Examples of CD lending activities include:

- The bank participated in a LIHTC project within its Denver MSA AA, providing \$26.0MM in financing for the construction of a multifamily affordable housing complex. The housing facility targets LMI individuals who are at-risk of homelessness or experiencing homelessness and also provides on-site family support services for residents, including childcare.
- A CD loan totaling \$24.5MM was originated for the construction of a 149-unit affordable housing facility for area workforce with LIHTC utilization and rent restrictions of less than 60 percent of area median income (AMI).

Table 20

Community Development Loans – Denver MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	15	129,561
Community Services	2	350
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	17	129,911

INVESTMENT TEST

The bank's performance under the investment test in the Denver MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of investment activity in the AA include:

- Twenty-six qualified pools of MBS investments that remain in the bank's investment portfolio from prior periods which were comprised of \$23.2MM in underlying loans within the AA that assisted LMI individuals in obtaining affordable housing.
- A bond purchased during the evaluation period totaling \$1.0MM provided funding for improvements to a school district in which a majority of students qualified for free or reduced lunches under the NSLP.
- Two donations totaling \$4.7M supported an organization that provides affordable housing resources and other support services to residents, of which a majority are LMI individuals and families.

Table 21

Investments, Grants, and Donations – Denver MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	26	23,227	0		7	10	33	23,237
Community Services	3	760	1	1,021	16	23	20	1,804
Economic Development	0	0	0	0	1	4	1	4
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	29	23,986	1	1,021	24	38	54	25,045
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Denver MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four banking offices in the AA, including one branch in a middle-income tract, two branches in upper-income tracts, and the bank's headquarters which is located in an unknown-income tract. Three of the bank's four banking offices operate one mile or less from LMI areas. Two of the four locations, including the main office, operate a drive thru.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior CRA evaluation, the bank opened a full-service branch in Lakewood. This branch operates in a middle-income tract that abuts a cluster of moderate-income tracts and provides for accessibility to bank delivery systems, particularly for LMI individuals and areas.

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. Lobby hours along with products and services do not vary by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday through Friday.

Table 22

Retail Banking and Community Development Services – Denver MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	25.0	50.0	25.0	100.0	5.2	25.3	36.5	30.3	2.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	25.0	50.0	25.0	100.0	5.0	26.6	36.3	31.1	1.1	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	4		1		0		0	0	1	0	0	1
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	13		38		10		0		61		25	
¹ Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

¹. Based on 2023 FFIEC census tract definitions.

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

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 61 services to 25 organizations and donated 844 hours during the evaluation period. The following activities were considered responsive to CD service needs in the AA:

- A bank officer provided over 140 hours serving on the board for an organization that provides community services to LMI individuals, including healthy food resources to individuals with severe illnesses. In their capacity, the bank representative served in a treasurer capacity providing their financial expertise.
- Three bank officers provided over 61 hours serving as consultants for an area economic development organization in the AA. In their capacities, the bankers provided financial guidance and education to small business owners and aspiring entrepreneurs in support of area economic development needs.

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

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

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

- There have been no changes to the AA delineation since the prior evaluation.
- The AA is comprised of 175 census tracts, including 4 low-, 48 moderate-, 72 middle-, 49 upper-, and 2 unknown-income census tracts. This represents a change from the prior evaluation when the AA had 136 tracts, including 7 low-, 41 moderate-, 53 middle-, 33 upper-, and 2 unknown-income census tracts.
- Of the bank's 30 branches, 4 are located in the AA with each branch operating an ATM.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank had a 3.8 percent market share of deposits in the AA, ranking 5th of 41 institutions operating from 132 banking offices.
- One community contact recently conducted as part of a CRA evaluation for a financial institution operating in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meetings those credit needs, and for perspectives on local economic conditions. The contact was affiliated with an economic development organization in the Colorado Springs area.

Table 23

Population Change			
Assessment Area: Colorado Springs MSA			
Area	2015 Population	2020 Population	Percent Change
Colorado Springs MSA	678,364	755,105	11.3
El Paso County, CO	655,024	730,395	11.5
Teller County, CO	23,340	24,710	5.9
Colorado	5,278,906	5,773,714	9.4
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- According to 2020 Census data, the population of Colorado Springs was 478,961, comprising 63.4 percent of the population of the AA.

- El Paso County, which includes the city of Colorado Springs, noted a significant growth rate of 11.5 percent between 2015 and 2020, higher than the 9.4 percent growth noted in the entire state of Colorado.
- A member of the community noted the average age of individuals in the area is 35, as there has been a significant number of younger individuals, such as those in the millennial generation, who are moving to the area.

Table 24

Median Family Income Change Assessment Area: Colorado Springs MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Colorado Springs MSA	77,956	83,751	7.4
El Paso County, CO	77,763	84,078	8.1
Teller County, CO	83,626	78,439	(6.2)
Colorado	81,753	92,752	13.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Teller County has a smaller percentage of families living below the poverty line at 4.3 percent, compared to El Paso County and the state of Colorado as a whole, with 6.6 and 6.1 percent below poverty, respectively.

Table 25

Housing Cost Burden Assessment Area: Colorado Springs MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Colorado Springs MSA	84.6	53.5	49.0	66.9	44.5	21.7
El Paso County, CO	84.9	53.1	48.9	67.1	44.4	21.5
Teller County, CO	69.7	71.6	52.7	63.1	46.0	25.6
Colorado	79.7	47.9	46.5	63.2	37.3	21.4
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- Housing affordability is constrained in the Colorado Spring MSA AA and the state of Colorado, with statistics noting a greater negative impact to low-income renters when compared to similarly-situated homeowners.
- A community contact noted a recent increase in multi-family units in the downtown area, with nearly 1,000 units constructed in the past few years. Additionally, duplex and triplex construction is on the rise in the eastern portion of the city, with changes in zoning laws allowing for more construction of these housing types.

Table 26

Unemployment Rates					
Assessment Area: Colorado Springs MSA					
Area	2018	2019	2020	2021	2022
Colorado Springs MSA	3.7	3.2	6.8	5.7	3.2
El Paso County, CO	3.7	3.2	6.7	5.7	3.3
Teller County, CO	3.4	3.0	7.0	5.0	3.0
Colorado	3.0	2.7	6.8	5.4	3.0
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- A community contact noted one of the main industries in the area is aerospace and defense, which is also linked to the area's cybersecurity and technology industry.
- Notable government employers in the AA include Fort Carson and the U.S. Air Force Academy, as well as Peterson and Schriever Space Force Bases and Cheyenne Mountain Space Force Station.

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

LENDING TEST

The bank's performance under the lending test in the Colorado Springs MSA AA is excellent. The lending test rating was bolstered by the bank's leadership position in originating CD loans in this AA.

Regarding the geographic and borrower distribution analyses, the evaluation of home mortgage lending was analyzed at the total home mortgage level with no individual analysis of its subproducts due to loan volumes too low to render a meaningful analysis.

Lending Activity

The bank's lending activities reflect excellent responsiveness to AA credit needs. The evaluation of AA lending included 63 home mortgage and 231 small business loans originated between January 1, 2022 and December 31, 2023.

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

Geographic Distribution of Loans

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

An analysis of lending patterns throughout the AA revealed gaps and/or lapses in the dispersion of small business and home mortgage loans, particularly with regard to dispersion among AA LMI tracts; however, a review of lending patterns as it relates to branch accessibility did not reveal concerns and were explained by reasonable performance context. Specifically, two large moderate-income tracts (0102.03 and 0101.12) in the far western portion of the AA in Teller County are situated in a mountainous region that are geographically isolated from the broader AA and constrain the bank's ability to reasonably serve these areas. As such, there was no impact to the conclusions for each product based on the gaps and/or lapses identified in lending patterns.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank did not originate a home mortgage loan in a low-income tract during 2023; however, aggregate lending data confirmed comparable limited performance and the demographic figure of owner-occupied units was also low, indicating limited home mortgage lending opportunities in these tracts. Lending in moderate-income tracts reflected much stronger performance with a concentration of lending that was significantly above the aggregate lending data by number volume and comparable by dollar volume, and significantly above the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected consistent performance with the penetration levels noted in 2023.

A conspicuous gap or lapse was identified that includes LMI tracts but is explained by performance context.

Table 27

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Colorado Springs MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	1.7	0	0.0	1.1	1.2
Moderate	5	31.3	18.2	1,147	27.5	14.4	5	55.6	19.0	399	17.4	14.8	20.0
Middle	3	18.8	38.8	745	17.9	35.9	1	11.1	41.3	341	14.9	38.1	43.4
Upper	8	50.0	41.2	2,272	54.6	48.4	3	33.3	37.9	1,556	67.8	45.9	35.2
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	4,164	100.0	100.0	9	100.0	100.0	2,296	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.8	0	0.0	1.3	0	0.0	1.5	0	0.0	1.0	1.2
Moderate	0	0.0	20.3	0	0.0	15.8	3	42.9	21.5	230	27.8	15.9	20.0
Middle	4	80.0	44.0	1,210	74.7	40.9	0	0.0	42.6	0	0.0	36.7	43.4
Upper	1	20.0	33.7	409	25.3	42.0	4	57.1	34.3	597	72.2	46.2	35.2
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,619	100.0	100.0	7	100.0	100.0	827	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.9	0	0.0	0.6	0	0.0	1.4	0	0.0	0.8	1.2
Moderate	3	42.9	15.3	654	66.5	12.4	2	25.0	16.8	25	9.3	14.0	20.0
Middle	2	28.6	40.1	60	6.1	34.6	5	62.5	42.7	194	72.1	38.4	43.4
Upper	2	28.6	43.4	270	27.4	52.2	1	12.5	38.9	50	18.6	46.6	35.2
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	984	100.0	100.0	8	100.0	100.0	269	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	1.3	0	0.0	2.6	0	0.0	1.4	0	0.0	0.1	
Moderate	0	0.0	47.5	0	0.0	50.9	0	0.0	43.1	0	0.0	53.3	45.1
Middle	0	0.0	41.3	0	0.0	34.7	0	0.0	36.1	0	0.0	10.3	33.1
Upper	1	100.0	10.0	825	100.0	11.8	0	0.0	19.4	0	0.0	36.3	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	825	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	2.9	1.5	15	0.2	1.2	0	0.0	1.6	0	0.0	1.0	1.2
Moderate	10	28.6	18.1	1,837	23.7	16.8	10	35.7	19.0	654	15.8	16.3	20.0
Middle	12	34.3	40.6	2,128	27.4	37.0	9	32.1	41.7	800	19.3	37.0	43.4
Upper	12	34.3	39.6	3,776	48.7	44.9	9	32.1	37.5	2,698	65.0	45.6	35.2
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	7,756	100.0	100.0	28	100.0	100.0	4,152	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The geographic distribution of small business lending is good. The distribution of small business lending in 2022 among low-income tracts was comparable to the aggregate lending data and demographic figure of total businesses, although minimal impact to the conclusion was applied due to a limited volume of lending reported by aggregate loan data reporters and a limited number of businesses operating in low-income tracts. The bank's penetration in moderate-income tracts was comparable to the aggregate lending data by number volume, below by dollar volume, and comparable the demographic figure.

The geographic distribution of small business lending in 2023 reflected performance that was above the level noted in 2022 with a distribution of loans that was significantly above the aggregate lending data and above the demographic figure.

Table 28

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Colorado Springs MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	2	1.4	1.1	2	0.0	0.9	2	2.2	2	0.0	1.2
Moderate	39	27.7	25.6	1,602	21.3	33.5	33	36.7	2,403	54.8	27.4
Middle	64	45.4	35.9	3,415	45.4	29.4	26	28.9	849	19.4	37.7
Upper	35	24.8	36.3	2,503	33.3	35.2	29	32.2	1,130	25.8	33.1
Unknown	1	0.7	0.5	1	0.0	0.8	0	0.0	0	0.0	0.7
Tract-Unk	0	0.0	0.6	0	0.0	0.3	0	0.0	0	0.0	0.0
Total	141	100.0	100.0	7,523	100.0	100.0	90	100.0	4,384	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

The bank's lending has a good distribution among individuals of different income levels and businesses of different sizes. This conclusion is consistent with the distribution of home mortgage and small business lending within the AA.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The distribution of 2023 loans to low-income borrowers was significantly above the aggregate lending data and was comparable to the demographic figure of the percentage of families. Lending to moderate-income borrowers was comparable to the aggregate lending data by number volume, below by dollar volume, and comparable to the demographic figure.

The borrower distribution of 2022 home mortgage loans was below the performance level of 2023 lending, with penetration that was generally comparable to the aggregate lending data and demographic figures.

Table 29

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Colorado Springs MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	\$%	\$%	#	##	##	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	6.3	2.4	238	5.7	1.2	1	11.1	2.5	90	3.9	1.1	18.8
Moderate	4	25.0	17.2	503	12.1	13.1	3	33.3	16.0	231	10.1	11.4	18.8
Middle	3	18.8	26.2	927	22.3	24.0	1	11.1	27.4	78	3.4	24.4	21.9
Upper	2	12.5	36.7	1,069	25.7	43.4	4	44.4	35.4	1,897	82.6	43.8	40.5
Unknown	6	37.5	17.4	1,427	34.3	18.4	0	0.0	18.8	0	0.0	19.3	0.0
Total	16	100.0	100.0	4,164	100.0	100.0	9	100.0	100.0	2,296	100.0	100.0	100.0
Refinance Loans													
Low	1	20.0	11.6	260	16.1	7.1	2	28.6	9.8	150	18.1	5.1	18.8
Moderate	0	0.0	20.9	0	0.0	17.1	0	0.0	19.4	0	0.0	13.6	18.8
Middle	0	0.0	24.4	0	0.0	24.2	1	14.3	24.2	43	5.2	21.1	21.9
Upper	3	60.0	27.1	959	59.2	33.8	2	28.6	29.2	122	14.8	33.1	40.5
Unknown	1	20.0	16.0	400	24.7	17.8	2	28.6	17.4	512	61.9	27.1	0.0
Total	5	100.0	100.0	1,619	100.0	100.0	7	100.0	100.0	827	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.2	0	0.0	3.4	1	12.5	6.6	10	3.7	4.0	18.8
Moderate	1	14.3	14.8	20	2.0	10.3	2	25.0	17.6	67	24.9	12.1	18.8
Middle	3	42.9	25.4	71	7.2	21.0	1	12.5	26.7	50	18.6	23.5	21.9
Upper	3	42.9	53.6	893	90.8	64.1	1	12.5	46.2	75	27.9	55.7	40.5
Unknown	0	0.0	1.0	0	0.0	1.3	3	37.5	2.9	67	24.9	4.7	0.0
Total	7	100.0	100.0	984	100.0	100.0	8	100.0	100.0	269	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	8.8	5.5	513	7.4	2.8	5	17.9	4.4	290	7.0	1.8	18.8
Moderate	6	17.6	17.9	558	8.1	13.9	5	17.9	17.0	298	7.2	11.8	18.8
Middle	8	23.5	25.7	1,034	14.9	23.9	3	10.7	26.9	171	4.1	23.9	21.9
Upper	10	29.4	36.9	2,999	43.3	42.1	9	32.1	36.4	2,689	64.8	43.0	40.5
Unknown	7	20.6	14.0	1,827	26.4	17.3	6	21.4	15.3	704	17.0	19.4	0.0
Total	34	100.0	100.0	6,931	100.0	100.0	28	100.0	100.0	4,152	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is good. The distribution of 2022 lending to small businesses was above the aggregate lending data by number volume and comparable to aggregate lending data and the demographic figure of the percentage of small businesses.

The borrower distribution of small business lending in 2023 reflected consistent performance with that of 2022 lending patterns.

Table 30

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Colorado Springs MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
By Revenue											
\$1 Million or Less	116	82.3	60.1	2,644	35.1	37.0	70	77.8	779	17.8	94.7
Over \$1 Million	25	17.7		4,879	64.9		20	22.2	3,605	82.2	4.5
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	
Total	141	100.0		7,523	100.0		90	100.0	4,384	100.0	100.0
By Loan Size											
\$100,000 or Less	124	87.9	96.7	730	9.7	47.1	78	86.7	360	8.2	
\$100,001 - \$250,000	5	3.5	1.6	950	12.6	11.4	6	6.7	1,120	25.5	
\$250,001 - \$1 Million	12	8.5	1.8	5,843	77.7	41.4	6	6.7	2,904	66.2	
Total	141	100.0	100.0	7,523	100.0	100.0	90	100.0	4,384	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	109	94.0		271	10.2		67	95.7	166	21.3	
\$100,001 - \$250,000	1	0.9		250	9.5		2	2.9	350	44.9	
\$250,001 - \$1 Million	6	5.2		2,123	80.3		1	1.4	263	33.8	
Total	116	100.0		2,644	100.0		70	100.0	779	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank is a leader in providing CD loans. The bank originated six loans totaling \$20.3MM in this AA which were responsive to a mixture of CD needs, as illustrated in Table 31. Examples of CD lending activities include:

- A \$14.3MM loan was originated for the construction of a 40-unit affordable housing complex that provides supportive housing units for homeless individuals and families. The property ownership coordinates with area community services organizations to provide health services, substance abuse services, and job training, among other critical rehabilitative services.
- A \$2.3MM loan provided financing for an area affordable housing organization to acquire land to build additional homes, as well as an additional property to expand the organization's operations and further its impact.

Table 31

Community Development Loans – Colorado Springs MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	2	16,537
Community Services	3	2,400
Economic Development	1	1,357
Revitalization and Stabilization	0	0
Total Loans	6	20,294

INVESTMENT TEST

The bank's performance under the investment test in the Colorado Springs MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of qualified investments include:

- Twenty-five qualified pools of MBS investments remain in the bank's investment portfolio from prior periods which were comprised of \$10.6MM in underlying loans within the AA that assisted LMI individuals in obtaining affordable housing.
- The bank provided 3 donations totaling \$37.5M to an area nonprofit organization that provides an array of community services to LMI individuals, with the primary impact consisting of individuals with disabilities or barriers procuring sustainable employment.
- The bank provided 2 donations totaling \$4.7M to an area community services organization that provides access to basic nutrition needs for the homeless and individuals experiencing emergency financial instability.

Table 32

Investments, Grants, and Donations – Colorado Springs MSA AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	25	10,613	0	0	6	27	31	10,640
Community Services	1	158	0	0	32	93	33	251
Economic Development	0	0	0	0	4	7	4	7
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	26	10,771	0	0	42	127	68	10,898
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Colorado Springs MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru 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 four branches in the AA, and all the locations are equipped with ATMs and drive-thru facilities. As illustrated in Table 33, the bank operates a branch in both a low- and moderate-income tract and two branches in middle-income tracts. This distribution of branches, particularly among LMI tracts, is above the demographic concentration in the AA and further supports accessibility for bank services within the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There have been no changes to the bank's branching footprint in this area since the prior CRA 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. Lobby hours along with products and services were discussed in the Institution section of this report and do not vary materially by market. Branch hours typically range from 9:00 a.m. to 5:00 p.m. from Monday through Friday.

Table 33

Retail Banking and Community Development Services – Colorado Springs 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
	25.0	25.0	50.0	0.0	0.0	100.0	2.3	27.4	41.1	28.0	1.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	25.0	25.0	50.0	0.0	0.0	100.0	2.0	27.4	41.7	28.6	0.3	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	4		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	2		29		2		0		33		18	

¹. Based on 2023 FFIEC census tract definitions.

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

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 33 CD services and donated 404 hours to service activities during the evaluation period. The following activities were considered responsive to CD needs in the AA:

- A member of the bank's executive leadership served on the board for an area organization that provides affordable housing and housing-related services to LMI individuals and families.
- Two bank representatives served on boards or provided technical financial support for fundraising activities and provided 59 hours of service for an area organization that provides housing and intensive substance abuse services for adults transitioning from homelessness to stability, in addition to other critical care services.

OTHER METROPOLITAN AREAS
(Limited-Scope Review)

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

The bank's AA is comprised of the Fort Collins, Colorado MSA, which consists of Larimer County in its entirety. See Appendix C for an AA map and Appendix E for information on the bank's lending performance in this AA.

- The bank's AA delineation remains unchanged since the prior evaluation.
- The AA consists of 86 total census tracts, including 1 low-, 16 moderate-, 52 middle-, 16 upper-, and 1 unknown-income census tract(s). This differs from the last evaluation when the AA had 73 census tracts, including 3 low-, 20 moderate-, 36 middle-, 13 upper-, and 1 unknown-income census tract(s).
- The bank operates two full-service branches in this AA. One branch is in a middle-income tract in Fort Collins and offers an ATM and full lobby and drive-thru services. A second branch in Loveland is located in a moderate-income tract and offers lobby services and an ATM.
- Based on 2020 Census data, the AA population was 359,066.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank held 0.7 percent market share of deposits in the AA, ranking 16th of 26 FDIC-insured depository institutions operating from 90 offices within the AA.

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

The bank's AA is comprised of Mesa County in its entirety, which is also defined as the Grand Junction, Colorado MSA. See Appendix C for an AA map and Appendix E for information on the bank's lending performance in this AA .

- The AA delineation remains unchanged since the prior evaluation.
- The AA is comprised of 33 total tracts, including 1 low-, 10 moderate-, 14 middle-, and 8 upper-income census tracts. This differs from the prior evaluation as there were 0 low-, 7 moderate-, 16 middle-, and 6 upper-income census tracts.
- Four full-service locations are located in the AA and offer lobby and drive-thru services, along with an ATM at each location. Two of the four branches are located in moderate-income census tracts while the remaining two branches are located in middle-income census tracts.
- Based on 2020 Census data, the AA population was 155,703.

- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank has 7.2 percent market share, ranking 6th of 13 FDIC-insured depository institutions operating from 37 offices in the AA.

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

The bank's AA is comprised of Boulder County in its entirety, which makes up the Boulder, Colorado MSA. See Appendix C for an AA map and Appendix E for information on the bank's lending performance in this AA.

- The AA delineation remains unchanged since the prior evaluation.
- The AA consists of 78 census tracts, including 4 low-, 13 moderate-, 32 middle-, 26 upper-, and 3 unknown-income census tracts. This has changed since the prior evaluation as the AA previously had 68 census tracts, including 5 low-, 14 moderate-, 30 middle-, and 19 upper-income census tracts.
- The bank operates one full-service branch in the AA, which was relocated within the AA since the last evaluation, moving from a moderate-income to an upper-income census tract. A cash dispensing-only ATM operates on the branch premises.
- According to 2020 Census data, the population of the AA is 330,758.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank has a 0.5 percent market share of deposits, ranking 23rd of 33 FDIC-insured depository institutions operating in the AA from 88 offices.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT COLLINS MSA AA, GRAND JUNCTION MSA AA, AND BOULDER MSA AA

The state of Colorado metropolitan AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas do not change the rating for the state of Colorado.

Table 34

Assessment Area	Lending Test	Investment Test	Service Test
Fort Collins MSA	Consistent	Consistent	Consistent
Grand Junction MSA	Below	Consistent	Consistent
Boulder MSA	Consistent	Consistent	Consistent

**MOUNTAIN COLORADO ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Mountain Colorado AA consists of Eagle, Garfield, and Pitkin Counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA delineation since the prior CRA evaluation.
- The AA is comprised of 34 total census tracts, including 1 moderate-, 11 middle-, and 22 upper-income census tracts; there are no low-income census tracts. This differs from the last evaluation, as the AA consisted of 9 middle- and 20 upper-income census tracts.
- The bank operates 7 of its 30 banking offices in this AA with each office maintaining an ATM, representing the highest numbers of branches within any of the bank's 11 delineated AAs.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank holds a 4.6 percent market share in the AA, ranking 5th of 13 FDIC-insured depository institutions operating from 63 branches.
- A discussion was held with a member of a community in this AA to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact was affiliated with a local economic development organization.

Table 35

Population Change Assessment Area: Mountain Colorado			
Area	2015 Population	2020 Population	Percent Change
Mountain Colorado	127,072	134,774	6.1
Eagle County, CO	52,576	55,731	6.0
Garfield County, CO	57,076	61,685	8.1
Pitkin County, CO	17,420	17,358	(0.4)
NonMSA Colorado	688,010	712,118	3.5
Colorado	5,278,906	5,773,714	9.4
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA is in the heart of the Rocky Mountain Range and includes the affluent ski and popular tourist resort areas surrounding the cities of Vail in Eagle County and Aspen in Pitkin County.

- According to 2020 Census data, the largest population centers in each county are Edwards in Eagle County with a population of 11,246; Rifle and Glenwood Springs in Garfield County with populations of 10,437 and 9,963, respectively; and Aspen in Pitkin County with a population of 7,004.

Table 36

Median Family Income Change Assessment Area: Mountain Colorado			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Mountain Colorado	84,845	90,527	6.7
Eagle County, CO	90,099	98,427	9.2
Garfield County, CO	74,154	86,677	16.9
Pitkin County, CO	111,879	97,643	(12.7)
NonMSA Colorado	66,320	72,390	9.2
Colorado	81,753	92,752	13.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA experienced significantly more growth in MFI between 2015 and 2020, with a rate of 6.7 percent, compared to the prior five-year period between 2010 and 2015 when the area saw a decline in MFI of 7.2 percent.
- The AA had 4.8 percent of families living below the poverty level, which is lower than that of nonmetropolitan areas statewide and the state of Colorado, with rates of 8.0 and 6.1 percent, respectively.
- A member of the community noted MFI increases have generally occurred across income-levels, including an observed increase in hourly wages in the area.

Table 37

Housing Cost Burden Assessment Area: Mountain Colorado						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Mountain Colorado	72.3	54.2	41.1	68.1	47.9	27.8
Eagle County, CO	79.6	49.8	48.9	72.0	54.3	32.0
Garfield County, CO	65.7	55.5	36.3	65.5	40.3	24.0
Pitkin County, CO	65.8	60.0	36.9	59.6	56.1	28.0
NonMSA Colorado	69.5	38.9	41.5	55.6	31.3	22.8
Colorado	79.7	47.9	46.5	63.2	37.3	21.4
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- Home ownership in the AA was considerably less affordable for LMI borrowers in comparison to nonmetropolitan areas statewide, and to a lesser extent, in comparison to the entire state of Colorado.
- The affordability ratio in the AA was 16.5 percent, compared to nonmetropolitan areas statewide at 22.0 percent and the state of Colorado at 20.3 percent, again indicating less affordable housing in the AA.
- A member of the community noted housing is a foundational challenge for the community, driven by a lack of affordable and attainable housing, and housing insecurity.

Table 38

Unemployment Rates Assessment Area: Mountain Colorado					
Area	2018	2019	2020	2021	2022
Mountain Colorado	2.8	2.5	8.0	5.1	2.9
Eagle County, CO	2.5	2.2	8.9	4.8	2.6
Garfield County, CO	3.0	2.6	6.3	5.1	3.0
Pitkin County, CO	3.5	3.1	9.8	5.9	3.3
NonMSA Colorado	3.1	2.7	6.6	5.2	3.1
Colorado	3.0	2.7	6.8	5.4	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates spiked higher in the ski resort and tourist areas of Eagle and Pitkin Counties in 2020, when compared to nonmetropolitan areas statewide and the state of Colorado. Unemployment rates in 2020 were elevated as a result of the pandemic but have since returned to lower levels, with rates in the AA comparable to statewide figures.
- Primary industries in the AA include government; hospitality, accommodation, and food services; retail trade; and construction.
- A community contact noted nearly half the businesses in the region are centered around or rely on tourism and visitation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MOUNTAIN COLORADO AA

LENDING TEST

The bank's performance under the lending test in the Mountain Colorado AA is good.

The geographic and borrower distribution analyses for home mortgage lending, home refinance, home improvement, and multifamily loans were not evaluated at the individual product level in this AA due to insufficient volume for a meaningful analysis.

As discussed in the AA description, the AA is predominately comprised of middle- and upper-income tracts. It does not contain a low-income tract and contains only one small moderate-income tract in the town of Avon (0005.04); as such, the borrower distribution of lending and CD lending activities carried greater weight in the determination of lending test performance in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of AA lending included 208 home mortgage loans and 523 small business loans originated between January 1, 2022 and December 31, 2023.

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

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. There were no loans originated in the AA's sole moderate-income tract. Aggregate loan data and the demographic figure of owner-occupied units also reflected very limited origination data within the tract. Lending in middle- and upper-income tracts reflected comparable penetration levels to the aggregate lending data and demographic figures.

The geographic distribution of home mortgage lending in 2022 reflected consistent performance to that of 2023 lending.

An analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the conclusion of performance.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. Consistent with the discussion of overall home mortgage lending, there were no home purchase originations in the AA's sole moderate-income tract in 2023. Lending in middle-income tracts was comparable to the aggregate lending data and demographic figure. Lending in upper-income tracts was above the aggregate lending data by number volume and comparable by dollar volume, and comparable to the demographic figure.

The bank's home purchase lending in 2022 reflected overall performance which was consistent with 2023 penetration levels, although lending was stronger in upper-income tracts relative to middle-income tract penetration.

An analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the conclusion of performance.

Table 39

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Mountain Colorado													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.7	0	0.0	1.9	0	0.0	1.9	0	0.0	1.9	1.2
Middle	8	26.7	44.1	3,777	16.7	33.8	32	31.1	44.7	11,259	24.7	31.8	37.1
Upper	22	73.3	53.2	18,901	83.3	64.4	71	68.9	53.5	34,331	75.3	66.4	61.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	22,678	100.0	100.0	103	100.0	100.0	45,590	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.0	0	0.0	0.6	0	0.0	1.4	0	0.0	0.4	1.2
Middle	7	35.0	36.0	4,970	49.2	21.8	4	21.1	35.7	853	4.1	21.9	37.1
Upper	13	65.0	63.0	5,122	50.8	77.6	15	78.9	62.9	19,793	95.9	77.7	61.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	10,092	100.0	100.0	19	100.0	100.0	20,646	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.3	0	0.0	0.8	0	0.0	2.2	0	0.0	1.4	1.2
Middle	3	33.3	33.2	166	28.2	25.7	5	50.0	34.6	1,249	56.8	33.6	37.1
Upper	6	66.7	65.5	422	71.8	73.5	5	50.0	63.1	950	43.2	65.0	61.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	588	100.0	100.0	10	100.0	100.0	2,199	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	8.8
Middle	0	0.0	33.3	0	0.0	49.6	0	0.0	66.7	0	0.0	54.1	37.6
Upper	2	100.0	66.7	22,135	100.0	50.4	0	0.0	33.3	0	0.0	45.9	53.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	22,135	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.0	0	0.0	1.3	0	0.0	1.7	0	0.0	1.3	1.2
Middle	20	29.0	38.7	9,030	14.7	29.1	46	33.1	40.7	13,734	19.9	27.7	37.1
Upper	49	71.0	59.3	52,358	85.3	69.7	93	66.9	57.5	55,129	80.1	71.0	61.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	69	100.0	100.0	61,388	100.0	100.0	139	100.0	100.0	68,863	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The geographic distribution of small business lending is adequate. The bank's concentration of 2022 lending in the AA's sole moderate-income tract was comparable to the aggregate lending data and demographic figure of total businesses. Lending in middle-income tracts was above the aggregate lending data by number volume, comparable by dollar volume, and comparable to the demographic figure. Lending in upper-income tracts was comparable to the aggregate lending data and the demographic figure.

The distribution of small business loans in 2023 reflected consistent performance with that of 2022 lending patterns.

An analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the conclusion of performance.

Table 40

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Mountain Colorado											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	1	0.4	3.1	1	0.0	3.1	4	1.6	26	0.3	2.5
Middle	105	37.5	28.3	6,857	38.5	33.6	86	35.4	3,376	34.8	27.6
Upper	174	62.1	64.2	10,971	61.5	62.1	153	63.0	6,311	65.0	69.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	4.4	0	0.0	1.2	0	0.0	0	0.0	0.0
Total	280	100.0	100.0	17,829	100.0	100.0	243	100.0	9,713	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

The bank's lending has an excellent distribution among individuals of different income levels and businesses of different sizes. This conclusion is consistent with the borrower distribution of home mortgage and small business lending within the AA.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The distribution of 2023 lending among low-income borrowers was comparable to the aggregate lending data, although below the demographic figure. Lending among moderate-income borrowers contained a larger volume of lending and was significantly above the aggregate lending data and comparable to the demographic figure.

The borrower distribution of home mortgage lending in 2022 reflected performance that was below 2023 penetration levels, although at a level which was generally above aggregate lending data or comparable to demographic figures.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. The distribution of 2023 home purchase loans to low-income borrowers was above the aggregate lending data by number volume and comparable by dollar volume but significantly below the demographic figure of the percentage of families. Lending to moderate-income borrowers was significantly above the aggregate lending data and was comparable to the demographic figure.

The borrower distribution of home purchase lending in 2022 reflected performance that was below 2023 penetration levels, although at a level which was generally above aggregate lending data or comparable to the demographic figures.

Table 41

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Mountain Colorado													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	1.5	0	0.0	0.5	4	3.9	1.2	194	0.4	0.3	11.9
Moderate	4	13.3	7.5	570	2.5	1.7	11	10.7	6.0	1,187	2.6	1.4	13.0
Middle	6	20.0	14.7	2,691	11.9	5.0	28	27.2	15.0	6,031	13.2	4.5	21.4
Upper	14	46.7	57.4	3,525	15.5	57.0	44	42.7	57.6	21,903	48.0	55.9	53.6
Unknown	6	20.0	18.9	15,892	70.1	35.8	16	15.5	20.2	16,275	35.7	37.8	0.0
Total	30	100.0	100.0	22,678	100.0	100.0	103	100.0	100.0	45,590	100.0	100.0	100.0
Refinance Loans													
Low	2	10.0	4.6	309	3.1	1.9	0	0.0	3.7	0	0.0	0.7	11.9
Moderate	2	10.0	8.6	138	1.4	2.5	1	5.3	6.5	159	0.8	1.1	13.0
Middle	2	10.0	15.8	589	5.8	5.1	6	31.6	13.6	1,903	9.2	3.4	21.4
Upper	11	55.0	53.4	4,022	39.9	52.9	9	47.4	50.9	5,281	25.6	35.9	53.6
Unknown	3	15.0	17.5	5,034	49.9	37.6	3	15.8	25.2	13,303	64.4	58.9	0.0
Total	20	100.0	100.0	10,092	100.0	100.0	19	100.0	100.0	20,646	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.3	0	0.0	0.8	2	20.0	2.7	69	3.1	5.7	11.9
Moderate	1	11.1	6.2	29	4.9	2.3	3	30.0	5.9	126	5.7	1.9	13.0
Middle	2	22.2	15.0	70	11.9	6.5	1	10.0	15.5	150	6.8	4.7	21.4
Upper	5	55.6	68.3	399	67.9	78.3	1	10.0	67.1	125	5.7	66.2	53.6
Unknown	1	11.1	9.3	90	15.3	12.0	3	30.0	8.8	1,729	78.6	21.6	0.0
Total	9	100.0	100.0	588	100.0	100.0	10	100.0	100.0	2,199	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	3.0	2.6	309	0.8	1.1	6	4.3	2.0	263	0.4	0.8	11.9
Moderate	7	10.4	7.4	737	1.9	1.9	17	12.2	6.0	1,627	2.4	1.2	13.0
Middle	13	19.4	14.5	3,447	8.8	4.6	36	25.9	14.5	8,112	11.8	3.8	21.4
Upper	34	50.7	58.2	9,544	24.3	57.4	57	41.0	57.4	27,524	40.0	48.7	53.6
Unknown	11	16.4	17.2	25,216	64.2	35.0	23	16.5	20.1	31,337	45.5	45.6	0.0
Total	67	100.0	100.0	39,253	100.0	100.0	139	100.0	100.0	68,863	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of 2022 loans originated to small businesses reflected penetration which was significantly above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure of small businesses.

The borrower distribution of small business loans in 2023 reflected consistent performance with that of 2022 lending patterns.

Table 42

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Mountain Colorado											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
By Revenue											
\$1 Million or Less	223	79.6	49.0	6,745	37.8	35.5	191	78.6	1,821	18.7	91.5
Over \$1 Million	55	19.6		10,846	60.8		51	21.0	7,627	78.5	7.2
Revenue Unknown	2	0.7		238	1.3		1	0.4	265	2.7	1.2
Total	280	100.0		17,829	100.0		243	100.0	9,713	100.0	100.0
By Loan Size											
\$100,000 or Less	243	86.8	93.7	1,823	10.2	36.2	224	92.2	2,189	22.5	
\$100,001 - \$250,000	9	3.2	3.1	1,726	9.7	14.8	5	2.1	929	9.6	
\$250,001 - \$1 Million	28	10.0	3.2	14,280	80.1	49.0	14	5.8	6,595	67.9	
Total	280	100.0	100.0	17,829	100.0	100.0	243	100.0	9,713	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	208	93.3		1,065	15.8		189	99.0	1,207	66.3	
\$100,001 - \$250,000	5	2.2		979	14.5		1	0.5	104	5.7	
\$250,001 - \$1 Million	10	4.5		4,701	69.7		1	0.5	510	28.0	
Total	223	100.0		6,745	100.0		191	100.0	1,821	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank makes an adequate level of CD loans in the AA. The bank originated 9 CD loans totaling \$10.0MM in this AA, of which a majority of CD dollars supported affordable housing needs, followed by economic development needs. Examples of CD lending in the AA include:

- The bank provided \$2.5MM in financing for the construction of affordable housing for area education workers in a high-cost resort area.
- The bank originated an SBA Program 504 loan for \$1.7MM to support an economic development project within the AA.

Table 43

Community Development Loans – Mountain Colorado AA		
Community Development Purpose	#	\$(000)
Affordable Housing	7	7,061
Community Services	0	0
Economic Development	2	2,975
Revitalization and Stabilization	0	0
Total Loans	9	10,036

INVESTMENT TEST

The bank's performance under the investment test in the Mountain Colorado AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of qualified investments include:

- Seventeen qualified pools of MBS investments that remain in the bank's investment portfolio from prior periods which were comprised of \$2.5MM in underlying loans within the AA that assisted LMI individuals in obtaining affordable housing.
- A bond purchased during a prior period totaling \$2.8MM provided funding for improvements to a school district in which a majority of students qualified for free or reduced lunches under the NSLP.
- A total of \$20.0M in philanthropic donations were made to an educational organization that provides an array of services in support of youth education and mentoring programs in an area where more than 70.0 percent of youth are from economically disadvantaged backgrounds.

Table 44

Investments, Grants, and Donations – Mountain Colorado AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	17	2,519	0	0	3	15	20	2,534
Community Services	1	2,790	0	0	10	26	11	2,816
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	18	5,309	0	0	14	42	32	5,351
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Mountain Colorado AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru 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 seven branches with ATMs in this AA, and four locations offer drive-thru facilities. One of the bank's full-service branches is located in the sole moderate-income tract in the AA, and the remaining branches are distributed among middle- and upper-income tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals, as there have been no branch openings or closures 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. Except for the bank's Aspen Branch, which closes at 3:30pm on Tuesdays, lobby hours, products and services do not vary materially by market. Branch hours generally range from 9:00 a.m. to 5:00 p.m., Monday through Friday.

Table 45

Retail Banking and Community Development Services – Mountain Colorado AA													
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	14.3	42.9	42.9	0.0	100.0	0.0	2.9	32.4	64.7	0.0	100.0	
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	14.3	42.9	42.9	0.0	100.0	0.0	2.5	36.7	60.8	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	
	7		0		0		0	0	0	0	0	0	
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization			Total Services		Total Organizations	
	9		11		3		0			23		11	
1. Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.													

Community Development Services

The bank is a leader in providing CD services. Bank staff provided 23 services and donated 481 hours in performance of CD services during the evaluation period. Examples of CD services performed in the AA include:

- A bank officer served on the board and provided 114 hours of service time during the evaluation for a local housing authority that focuses on providing affordable rental housing and home ownership opportunities to LMI individuals and families in the AA.
- Two bank officers provided 108 service hours and their financial expertise serving on various loan review committees for an area organization that specializes in providing services to small business owners and start-up entrepreneurs.

**SAN MIGUEL COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN MIGUEL COUNTY AA

The bank's AA includes San Miguel County in its entirety. See Appendix C for an AA map and Appendix E for information on the bank's lending performance in this AA.

- The AA delineation and census tract composition remain unchanged since the prior evaluation and is comprised of four total census tracts, including two middle- and two upper-income census tracts.
- Of the bank's 30 branch locations, this AA includes 1 branch located in a middle-income tract that offers lobby service and an ATM.
- According to 2020 Census data, the population of the AA was 8,072.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank has a 7.3 percent market share, ranking 4th of 6 FDIC-insured depository institutions operating from 7 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SAN MIGUEL COUNTY AA

The state of Colorado nonmetropolitan 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 in this area do not change the rating for the state of Colorado.

Table 46

Assessment Area	Lending Test	Investment Test	Service Test
San Miguel County	Below	Consistent	Below

STATE OF WYOMING

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

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is good.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes is good.
- The bank makes an adequate level of CD loans within its Wyoming AAs.

Investment Test

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

SCOPE OF EXAMINATION

The scope of the review for the state of Wyoming was consistent with the overall scope for the institution. Full-scope reviews were conducted for the Cheyenne MSA AA and Northern Wyoming AA. The state rating was based on the performance in these two AAs, with generally even weighting among the AAs in determining overall conclusions. Limited-scope reviews were conducted for the Casper MSA AA and Albany County AA to ascertain if the bank's performance in those areas was consistent with its performance in the overall state evaluation. The loan products used in the analysis for this state were consistent with those described in the Institution section of the evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN WYOMING

The bank delineates 4 of its 11 AAs and operates 7 of its 30 branches in the state of Wyoming. The Northern Wyoming AA is a rural area that encompasses most of the northern portion of the state. The Casper MSA AA is a one-county metropolitan area located in the center of the state. The Albany County AA is a nonmetropolitan area that is contiguous to the Cheyenne MSA AA, which is a one-county MSA located in the far southeastern corner of Wyoming.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of the report, with a primary emphasis on commercial lending, followed by residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING

LENDING TEST

The bank's performance under the lending test in the state of Wyoming is high satisfactory. The lending test in the Cheyenne MSA AA is good, followed by excellent performance in the Northern Wyoming AA.

Lending Activity

The bank's overall lending activities in the state of Wyoming reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers, and the lending programs offered by the bank are consistent among the four Wyoming AAs.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Wyoming reflects good distribution among the different census tracts and dispersion throughout the AAs. The geographic distribution of loans in the Cheyenne MSA AA reflects good penetration levels, where excellent penetration was noted in the Northern Wyoming AA.

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

The bank's lending within Wyoming has an overall good penetration among individuals of different income levels and businesses of different sizes. This conclusion mirrors the performance noted in the borrower distribution analyses for both the Cheyenne MSA AA and the Northern Wyoming AA

Community Development Lending

The bank makes an adequate level of CD loans within the state of Wyoming. The bank originated 10 CD loans totaling \$11.9MM in AAs within the state. The bank made an adequate level of CD loans in the Cheyenne MSA AA and a relatively high level in its Northern Wyoming AA during the evaluation period. As illustrated in the table below, the bank's CD lending was responsive to the needs of area organizations that provide community services to LMI individuals and families, as well as responsive to the needs of area small businesses and areas in need of revitalization and stabilization.

Table 47

Community Development Loans – State of Wyoming		
Community Development Purpose	#	\$(000)
Affordable Housing	0	0
Community Services	4	1,250
Economic Development	3	10,595
Revitalization and Stabilization	3	90
Total Loans	10	11,935

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Wyoming is outstanding. The bank's investment performance in both AAs subject to full-scope review is excellent, with particularly strong performance noted in the Cheyenne MSA AA with regard to philanthropic donation activities.

The bank has an excellent level of qualified CD investments and grants within Wyoming and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AAs.

In the state of Wyoming, the bank presented 39 of the 71 MBS pools that remain in its investment portfolio from prior periods. These investments supported 65 affordable housing projects totaling \$9.0MM, providing home mortgage loans to LMI individuals across several of the bank's Wyoming AAs; investments were allocated by respective AA in the individual AA analyses.

Additionally, the bank presented 41 bonds from two issuances from a prior period totaling \$5.8MM that supported the revitalization and stabilization needs of areas within the Albany County AA. Additionally, the bank presented 15 bonds from one issuance totaling \$8.5MM which funded the construction and renovation of buildings at a community college primarily serving students with significant financial needs. These investments benefited the Cheyenne MSA AA.

To further demonstrate its commitment to meeting critical AA needs, the bank's philanthropic donation activities totaled \$155.0M and were distributed to 55 Wyoming organizations during the evaluation period, of which a significant majority were comprised of organizations that provide community services to LMI individuals and families.

Table 48

Investments, Grants, and Donations – State of Wyoming								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	65	8,967	0	0	7	9	72	8,976
Community Services	15	8,460	0	0	83	120	98	8,580
Economic Development	0	0	0	0	18	26	18	26
Revitalization and Stabilization	41	5,775	0	0	0	0	41	5,775
Outside Activities	2	271	0	0	0	0	2	271
Total	121	23,202	0	0	108	155	229	23,357
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's overall performance under the service test in the state of Wyoming is outstanding.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru facilities and online and mobile banking, within Wyoming are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. As illustrated in Table 49, branch and ATM facilities generally align with AA demographics.

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

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-thru hours are generally consistent among each AA with all locations offering similar products and services as described further in the Institution section of this evaluation.

Table 49

Retail Banking and Community Development Services – State of Wyoming													
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	28.6	71.4	0.0	0.0	100.0	0.0	22.6	59.1	16.1	2.2	100.0	
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	28.6	71.4	0.0	0.0	100.0	0.0	19.9	62.2	17.1	0.7	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)						
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	7		0		0		0	0	0	0	0	0	
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization			Total Services		Total Organizations	
	8		30		12		0			50		28	
¹ Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.													

Community Development Services

The bank is a leader in providing CD services within the state of Wyoming. Bank staff provided 50 CD services and donated 1,067 hours to 28 organizations in the Wyoming AAs. CD services generally included bank officers and staff serving on the boards for organizations that support community services to LMI individuals and families, as well as agencies that support area affordable housing and small business needs.

**CHEYENNE MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Cheyenne MSA AA includes Laramie County in its entirety, which also comprises the Cheyenne, Wyoming MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 27 census tracts, including 6 moderate-, 14 middle-, 6 upper-, and 1 unknown-income census tract(s). The AA tract composition has changed since the prior evaluation due to the addition of 4 middle- and 2 upper-income census tracts.
- Of the bank's 30 banking locations, 2 branches and 2 ATMs are located in the AA.
- Based on the June 30, 2023 FDIC Deposit Market Share Report, the bank has a 13.0 percent market share, ranking 3rd of 19 FDIC-insured depository institutions operating from 32 offices in the AA.
- Two members of the community were interviewed to ascertain the credit needs of the area, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. Each contact represented an economic development organization.

Table 50

Population Change Assessment Area: Cheyenne MSA			
Area	2015 Population	2020 Population	Percent Change
Cheyenne MSA	95,431	100,512	5.3
Wyoming	579,679	576,851	(0.5)
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The city of Cheyenne represents the major population center in the AA, with a total population of 65,132 in 2020, followed by Ranchettes with 6,199 residents.

Table 51

Median Family Income Change Assessment Area: Cheyenne MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Cheyenne MSA	82,743	82,325	(0.5)
Wyoming	79,970	81,290	1.7
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Based on 2020 Census data, there were 5.8 percent of families below the poverty level, compared to 6.7 percent of families in the state of Wyoming.

Table 52

Housing Cost Burden Assessment Area: Cheyenne MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Cheyenne MSA	69.4	29.9	39.0	61.7	27.8	18.5
Wyoming	64.9	22.2	34.1	51.1	27.6	16.9
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- The AA housing affordability ratio of 28.7 percent is comparable to the affordability ratio in the state of Wyoming of 28.6 percent, indicating similar housing affordability to statewide figures.

Table 53

Unemployment Rates Assessment Area: Cheyenne MSA					
Area	2018	2019	2020	2021	2022
Cheyenne MSA	3.9	3.5	5.2	4.2	3.5
Wyoming	4.1	3.7	5.9	4.6	3.6
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- The AA has historically experienced lower unemployment rates when compared to the state of Wyoming, and the rise in unemployment due to the 2020 pandemic was lower than increases noted in the bank's other AAs.
- The primary industries in the AA include government-related industries; retail trade; health care and social assistance; and accommodation and food services.
- The largest employers in the area include F.E. Warren U.S. Air Force Base, the state of Wyoming, Laramie County School District, the U.S. Government, and the Cheyenne Regional Medical Center.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHEYENNE MSA AA

LENDING TEST

The bank's performance under the lending test in the Cheyenne MSA AA is good.

Regarding the geographic and borrower distribution analyses, home refinance, home improvement, and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to conduct meaningful analyses.

In addition, as indicated in the area description, the AA did not contain any low-income tracts during the evaluation period. As such, the borrower distribution of lending and CD lending activities carried greater weight in the determination of lending test performance in the AA.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of loans in the AA included 114 home mortgage loans and 79 small business loans originated during a two-year period between January 1, 2022 and December 31, 2023.

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

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans among moderate-income tracts was above the aggregate lending data by number volume and comparable by dollar volume and was above the demographic figure of owner-occupied units.

The distribution of home mortgage lending in 2022 was above the performance of 2023 lending with a distribution of loans among moderate-income tracts that was significantly above aggregate lending data and the demographic figure.

Additionally, an analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the performance conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The distribution of 2023 home purchase loans among moderate-income tracts was above the aggregate lending data by number volume and comparable by dollar volume, and was significantly above the demographic figure.

The distribution of home purchase lending in 2022 was above the performance of 2023 and reflected a distribution of loans among moderate-income tracts that was significantly above aggregate lending data and the demographic figure.

Additionally, an analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the performance conclusion.

Table 54

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Cheyenne MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	35.1	13.5	924	25.4	9.4	6	18.2	12.2	415	8.7	8.5	11.3
Middle	21	56.8	57.1	1,640	45.1	54.9	19	57.6	57.5	2,458	51.7	56.6	57.1
Upper	3	8.1	29.4	1,073	29.5	35.7	8	24.2	30.4	1,879	39.5	34.9	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	3,637	100.0	100.0	33	100.0	100.0	4,752	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	15.0	9.8	247	5.8	7.4	1	20.0	9.0	34	7.7	7.2	11.3
Middle	11	55.0	59.5	1,883	43.9	56.3	2	40.0	59.7	76	17.2	59.0	57.1
Upper	6	30.0	30.7	2,160	50.3	36.3	2	40.0	31.3	333	75.2	33.8	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	4,290	100.0	100.0	5	100.0	100.0	443	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.6	0	0.0	9.6	0	0.0	5.2	0	0.0	3.6	11.3
Middle	5	71.4	59.7	192	67.6	54.1	2	66.7	57.5	92	72.4	56.9	57.1
Upper	2	28.6	28.7	92	32.4	36.3	1	33.3	37.4	35	27.6	39.5	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	284	100.0	100.0	3	100.0	100.0	127	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	35.7	0	0.0	42.6	0	0.0	60.0	0	0.0	33.5	27.4
Middle	0	0.0	57.1	0	0.0	44.7	0	0.0	40.0	0	0.0	66.5	59.5
Upper	0	0.0	7.1	0	0.0	12.7	0	0.0	0.0	0	0.0	0.0	13.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	23.2	11.8	1,171	13.8	9.8	7	15.6	10.9	449	8.1	9.2	11.3
Middle	41	59.4	58.2	3,864	45.6	54.9	24	53.3	57.6	2,644	47.5	57.2	57.1
Upper	12	17.4	30.0	3,436	40.6	35.3	14	31.1	31.5	2,476	44.5	33.7	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	69	100.0	100.0	8,471	100.0	100.0	45	100.0	100.0	5,569	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of 2022 lending among moderate-income tracts was below the aggregate lending data by number volume, above by dollar volume, and comparable to the demographic figure of total businesses.

The geographic distribution of 2023 small business lending reflected performance which was above that of 2022 lending patterns with penetration comparable to the demographic figure.

Additionally, an analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the performance conclusion.

Table 55

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Cheyenne MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	16	40.0	62.1	2,280	71.5	55.0	18	46.2	3,873	85.4	47.6
Middle	15	37.5	23.2	844	26.5	27.1	15	38.5	576	12.7	34.5
Upper	9	22.5	14.0	66	2.1	17.6	6	15.4	86	1.9	17.7
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	40	100.0	100.0	3,190	100.0	100.0	39	100.0	4,535	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

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

Home Mortgage Lending

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

The borrower distribution of home mortgage lending in 2022 was consistent with the performance of lending in 2023.

Home Purchase Loans

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

The borrower distribution of home purchase lending in 2022 was consistent with the performance of lending in 2023.

Table 56

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Cheyenne MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	14	37.8	6.5	851	23.4	3.6	6	18.2	3.1	397	8.4	1.4	17.3
Moderate	10	27.0	23.8	638	17.5	18.0	11	33.3	20.4	1,334	28.1	13.8	17.9
Middle	9	24.3	23.5	1,228	33.8	23.1	6	18.2	25.9	390	8.2	23.0	25.0
Upper	4	10.8	25.9	920	25.3	33.2	7	21.2	33.0	1,580	33.2	41.6	39.7
Unknown	0	0.0	20.3	0	0.0	22.1	3	9.1	17.7	1,051	22.1	20.2	0.0
Total	37	100.0	100.0	3,637	100.0	100.0	33	100.0	100.0	4,752	100.0	100.0	100.0
Refinance Loans													
Low	4	20.0	12.0	550	12.8	7.5	1	20.0	8.1	34	7.7	4.8	17.3
Moderate	6	30.0	23.7	959	22.4	20.1	3	60.0	20.2	394	88.9	15.1	17.9
Middle	5	25.0	24.2	809	18.9	23.5	1	20.0	21.5	15	3.4	21.4	25.0
Upper	4	20.0	23.9	1,839	42.9	30.4	0	0.0	34.5	0	0.0	37.7	39.7
Unknown	1	5.0	16.2	133	3.1	18.5	0	0.0	15.7	0	0.0	21.1	0.0
Total	20	100.0	100.0	4,290	100.0	100.0	5	100.0	100.0	443	100.0	100.0	100.0
Home Improvement Loans													
Low	1	14.3	6.9	21	7.4	4.3	1	33.3	2.3	50	39.4	1.8	17.3
Moderate	5	71.4	22.2	228	80.3	15.4	0	0.0	16.7	0	0.0	11.8	17.9
Middle	1	14.3	28.2	35	12.3	26.8	1	33.3	25.3	35	27.6	20.1	25.0
Upper	0	0.0	39.4	0	0.0	48.9	1	33.3	51.1	42	33.1	59.8	39.7
Unknown	0	0.0	3.2	0	0.0	4.6	0	0.0	4.6	0	0.0	6.5	0.0
Total	7	100.0	100.0	284	100.0	100.0	3	100.0	100.0	127	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	20	29.0	8.2	1,462	17.3	4.7	9	20.0	4.1	499	9.0	2.0	17.3
Moderate	21	30.4	23.3	1,825	21.5	18.4	15	33.3	19.7	1,807	32.4	14.0	17.9
Middle	18	26.1	24.4	2,181	25.7	23.3	9	20.0	24.6	470	8.4	22.5	25.0
Upper	9	13.0	26.8	2,870	33.9	33.0	9	20.0	36.5	1,742	31.3	42.0	39.7
Unknown	1	1.4	17.2	133	1.6	20.6	3	6.7	15.1	1,051	18.9	19.6	0.0
Total	69	100.0	100.0	8,471	100.0	100.0	45	100.0	100.0	5,569	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of loans to small businesses in 2022 was comparable to the aggregate lending data by number volume, significantly below by dollar volume, and was below the demographic figure of small businesses.

The distribution of loans to small businesses in 2023 reflected consistent performance with that of 2022 lending patterns, although the bank's concentration of lending was comparable to the demographic figure.

Table 57

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Cheyenne MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	24	60.0	53.8	189	5.9	33.8	26	66.7	322	7.1	91.8
Over \$1 Million	15	37.5		3,000	94.0		13	33.3	4,213	92.9	5.4
Revenue Unknown	1	2.5		1	0.0		0	0.0	0	0.0	2.8
Total	40	100.0		3,190	100.0		39	100.0	4,535	100.0	100.0
By Loan Size											
\$100,000 or Less	33	82.5	97.1	329	10.3	57.0	33	84.6	415	9.2	
\$100,001 - \$250,000	2	5.0	1.7	369	11.6	11.7	1	2.6	250	5.5	
\$250,001 - \$1 Million	5	12.5	1.2	2,492	78.1	31.3	5	12.8	3,870	85.3	
Total	40	100.0	100.0	3,190	100.0	100.0	39	100.0	4,535	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	24	100.0		189	100.0		26	100.0	322	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	
Total	24	100.0		189	100.0		26	100.0	322	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank provides an adequate level of CD loans in the Cheyenne MSA AA. The bank originated 4 CD loans totaling \$1.3MM in this AA and was responsive to organizations that provide community services that benefit LMI individuals and families. Examples of CD lending include:

- Two CD loans totaling \$1.0MM provided ongoing funding for medical services to area LMI individuals and individuals denied health insurance.
- The bank provided \$185.0M in financing to an area organization that provides an array of community services to LMI individuals, including programs to aid in healthcare needs for senior citizens and health and housing assistance for veterans.

Table 58

Community Development Loans – Cheyenne MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	0	0
Community Services	4	1,250
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	4	1,250

INVESTMENT TEST

The bank's performance under the investment test in the Cheyenne MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of qualified investment activities include:

- Twenty-six MBS investments that remain in the bank's portfolio from prior periods which were comprised of \$4.4MM in underlying loans inside the AA that enabled LMI individuals and families to obtain affordable housing.
- A total of \$13.0M in donations provided to an area organization that provides emergency shelter and access to independent living for homeless individuals and families.

Table 59

Investments, Grants, and Donations – Cheyenne MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	26	4,381	0	0	4	6	30	4,386
Community Services	15	8,460	0	0	36	72	51	8,532
Economic Development	0	0	0	0	5	4	5	4
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	41	12,841	0	0	45	82	86	12,923
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Cheyenne MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru 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 two branches in Cheyenne, including one full-service branch and one limited-service location inside a grocery store. The full-service branch offers full lobby services and a drive-thru facility, and the limited-service branch has no drive-thru. The limited-service branch offers check cashing and deposit-related services, although loan applicants are referred to the full-service branch for credit underwriting and processing. The full-service branch is located in a moderate-income tract, while the limited-service branch is located in a middle-income tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened or closed any branches in this AA since the prior CRA 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. Lobby hours along with products and services do not vary by market. Branch hours range from 9:00 a.m. to 6:00 p.m. from Monday through Friday.

Table 60

Retail Banking and Community Development Services – Cheyenne MSA AA													
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	50.0	50.0	0.0	0.0	100.0	0.0	22.2	51.9	22.2	3.7	100.0	
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)						
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
	0.0	50.0	50.0	0.0	0.0	100.0	0.0	18.2	54.9	26.9	0.0	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)						
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	2		0		0		0	0	0	0	0	0	
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization			Total Services		Total Organizations	
	3		13		7		0			23		12	
^{1.} Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.													

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a totaling of 23 CD services and donated 538 hours of time during the evaluation period. Examples of CD services include:

- Two bank officers provided 88 hours of time and their financial expertise in capacities such as board membership, finance committee member, and building committee member for an area organization that provides transitional housing and other vital services to LMI individuals and families.
- A bank officer provided 82 hours of time and their financial expertise serving on various committees for an area organization that provides emergency services to families experiencing homelessness.

**CASPER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's AA includes Natrona County in its entirety, which also comprises the Casper, Wyoming MSA. Refer to Appendix C for a map of the AA and Appendix E for additional information on the lending performance in this AA.

- The bank's AA remains unchanged since the prior evaluation.
- The AA has a total of 20 census tracts, including 5 moderate-, 9 middle-, and 6 upper-income census tracts. This has changed since the prior evaluation when the AA had 18 census tracts, including 1 low-, 3 moderate-, 11 middle-, and 3 upper-income census tracts.
- The bank operates one full-service branch in the AA in a middle-income census tract, with lobby and drive-thru access, as well as an ATM.
- Based on 2020 Census data, the AA had a population of 79,955.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank held a 1.8 percent market share of deposits in the AA, ranking 9th of 9 FDIC-insured depository institutions operating from 19 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CASPER MSA AA

The state of Wyoming metropolitan 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 in this area do not change the rating for the state of Wyoming.

Table 61

Assessment Area	Lending Test	Investment Test	Service Test
Casper MSA	Consistent	Consistent	Consistent

**NORTHERN WYOMING ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

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

The bank's Northern Wyoming AA consists of Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior evaluation.
- The AA has a total of 25 census tracts, including 8 moderate-, 25 middle-, and 2 upper-income census tracts. The AA tract composition has changed since the last evaluation when the AA had 4 moderate-, 20 middle-, and 4 upper-income tracts for a total of 28 census tracts. The AA contained underserved middle-income tracts in Big Horn, Park, and Washakie Counties as designated by the FFIEC in 2023.
- The AA contains 3 of the bank's 30 branches. Each branch offers an ATM.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank has a 2.4 percent market share, ranking 13th of 16 FDIC-insured depository institutions operating from 60 offices in the AA.
- One recent community contact conducted as part of a CRA evaluation for a financial institution operating in the AA was leveraged to ascertain the credit needs of area communities and for perspective on local economic conditions. The contact represented an economic development organization serving communities within the AA.

Table 62

Population Change			
Assessment Area: Northern Wyoming			
Area	2015 Population	2020 Population	Percent Change
Northern Wyoming	140,440	139,845	(0.4)
Big Horn County, WY	11,895	11,521	(3.1)
Campbell County, WY	48,013	47,026	(2.1)
Hot Springs County, WY	4,809	4,621	(3.9)
Johnson County, WY	8,600	8,447	(1.8)
Park County, WY	28,985	29,624	2.2
Sheridan County, WY	29,738	30,921	4.0
Washakie County, WY	8,400	7,685	(8.5)
NonMSA Wyoming	404,237	396,384	(1.9)
Wyoming	579,679	576,851	(0.5)
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The seven AA counties experienced various levels of population change between 2015 and 2020, ranging from an 8.5 percent decrease in Washakie County to a 4.0 percent increase in Sheridan County.
- Campbell County is the most densely populated county in the AA and is home to the largest city in the AA, Gillette, with a population of 33,403 in 2020. The second largest city in the AA is Sheridan, the county seat of Sheridan County, with a population of 18,737 in 2020.

Table 63

Median Family Income Change Assessment Area: Northern Wyoming			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Northern Wyoming	80,342	78,553	(2.2)
Big Horn County, WY	65,029	68,877	5.9
Campbell County, WY	95,992	87,835	(8.5)
Hot Springs County, WY	65,322	64,960	(0.6)
Johnson County, WY	70,308	70,737	0.6
Park County, WY	73,336	74,676	1.8
Sheridan County, WY	77,595	83,570	7.7
Washakie County, WY	72,234	67,557	(6.5)
NonMSA Wyoming	79,576	81,346	2.2
Wyoming	79,970	81,290	1.7
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA counties also experienced varying levels of change in MFI between 2015 and 2020. Cumulatively, the AA had a 2.2 percent decrease in MFI while nonmetropolitan areas statewide experienced the opposite, with a 2.2 percent increase in MFI.
- The percentage of families below the poverty level varies greatly between AA counties, with a low of 3.3 percent in Sheridan County and a high of 10.6 percent in Hot Springs County. However, the overall rate for the AA of 6.8 percent is comparable to the nonmetropolitan areas statewide at 6.9 percent.

Table 64

Housing Cost Burden Assessment Area: Northern Wyoming						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northern Wyoming	56.7	11.5	28.3	53.2	26.4	17.6
Big Horn County, WY	31.3	8.5	17.8	40.3	13.9	14.7
Campbell County, WY	62.2	19.4	33.6	66.9	21.0	17.6
Hot Springs County, WY	58.2	0.0	25.2	53.7	20.8	15.6
Johnson County, WY	33.8	0.0	21.7	47.3	21.7	15.1
Park County, WY	51.4	14.8	23.9	51.8	27.0	16.5
Sheridan County, WY	68.6	12.3	32.6	43.1	41.3	22.2
Washakie County, WY	57.4	0.0	21.1	48.2	10.5	12.5
NonMSA Wyoming	62.3	19.6	32.1	48.0	25.7	16.3
Wyoming	64.9	22.2	34.1	51.1	27.6	16.9

Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The percentage of owner-occupied units in the AA was above that of nonmetropolitan areas statewide, at 62.3 percent and 57.3 percent, respectively.
- A community contacted noted that a lack of affordable housing poses an obstacle for economic development across Wyoming, with nearly one out of every four families in Campbell and Sheridan counties feeling cost-burdened with respect to housing. While homebuilding is ongoing, the pace is not enough to meet current housing needs.

Table 65

Unemployment Rates Assessment Area: Northern Wyoming					
Area	2018	2019	2020	2021	2022
Northern Wyoming	4.2	3.9	5.8	4.7	3.6
Big Horn County, WY	4.7	4.4	5.0	4.6	4.1
Campbell County, WY	4.1	3.8	7.0	5.4	3.6
Hot Springs County, WY	3.7	3.5	5.0	4.0	2.9
Johnson County, WY	4.0	3.8	5.6	4.3	3.5
Park County, WY	4.4	4.2	5.4	4.3	3.6
Sheridan County, WY	4.1	3.6	5.0	4.4	3.3
Washakie County, WY	4.2	4.1	5.3	4.1	4.0
NonMSA Wyoming	4.0	3.7	5.7	4.5	3.5
Wyoming	4.1	3.7	5.9	4.6	3.6

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Wyoming is the largest coal producing state in the country and Campbell County is home to 12 of the state's 16 major coal mines.
- Major industries in the AA include government industries, retail trade, accommodation and food services, health care and social assistance, and mining, quarrying, and oil and gas extraction.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHERN WYOMING AA

LENDING TEST

The bank's performance under the lending test in the Northern Wyoming AA is excellent.

Regarding the geographic and borrower distribution analyses, home refinance, home improvement, and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to conduct meaningful analyses.

As indicated in the area description, the AA did not contain any low-income tracts during the evaluation period. As such, the borrower distribution of lending and CD lending activities carried greater weight in the determination of lending test performance in the AA.

Lending Activity

The bank's lending activities reflect excellent responsiveness to AA credit needs. The evaluation of loans in the AA included 85 home mortgage loans and 100 small business loans originated during a two-year period between January 1, 2022 and December 31, 2023.

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

Geographic Distribution of Loans

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

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans among moderate-income tracts was significantly above the aggregate lending data and demographic figure of owner-occupied units.

The distribution of home mortgage lending in 2022 reflected consistent performance with that of 2023 lending levels.

Additionally, an analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the performance conclusion.

Table 66

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Northern Wyoming													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	31.8	22.1	932	34.8	19.7	15	65.2	24.1	1,454	59.1	21.1	20.7
Middle	15	68.2	64.1	1,743	65.2	66.2	8	34.8	64.8	1,007	40.9	67.7	70.9
Upper	0	0.0	13.8	0	0.0	14.0	0	0.0	11.0	0	0.0	11.3	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	2,675	100.0	100.0	23	100.0	100.0	2,461	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	41.7	23.4	1,244	56.9	19.9	3	37.5	18.8	182	24.7	16.2	20.7
Middle	6	50.0	67.4	872	39.9	70.6	4	50.0	70.8	451	61.1	72.1	70.9
Upper	1	8.3	9.2	71	3.2	9.4	1	12.5	10.3	105	14.2	11.7	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	2,187	100.0	100.0	8	100.0	100.0	738	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	75.0	24.9	105	70.0	20.3	1	16.7	23.3	21	5.5	21.3	20.7
Middle	1	25.0	70.0	45	30.0	71.6	5	83.3	74.0	360	94.5	76.9	70.9
Upper	0	0.0	5.2	0	0.0	8.2	0	0.0	2.7	0	0.0	1.9	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	150	100.0	100.0	6	100.0	100.0	381	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	9.2	0	0.0	16.7	0	0.0	31.3	29.8
Middle	0	0.0	80.0	0	0.0	90.8	1	100.0	83.3	340	100.0	68.8	55.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	340	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	17	40.5	22.7	2,581	46.9	19.6	21	48.8	23.1	1,723	42.0	20.3	20.7
Middle	23	54.8	65.6	2,820	51.3	68.3	21	48.8	66.8	2,273	55.4	68.7	70.9
Upper	2	4.8	11.7	101	1.8	12.1	1	2.3	10.1	105	2.6	11.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	42	100.0	100.0	5,502	100.0	100.0	43	100.0	100.0	4,101	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The geographic distribution of small business lending is excellent. The distribution of 2022 small business lending among moderate-income tracts was significantly above the aggregate lending data and the demographic figure of total businesses.

The geographic distribution of 2023 small business lending reflected performance which was consistent with 2022 lending patterns.

Additionally, an analysis of the dispersion of lending did not reveal any gaps or lapses that impacted the performance conclusion.

Table 67

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Northern Wyoming											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	31	50.0	9.1	1,151	24.0	13.5	15	39.5	1,018	74.4	14.4
Middle	31	50.0	87.5	3,640	76.0	83.8	23	60.5	350	25.6	82.9
Upper	0	0.0	2.3	0	0.0	1.9	0	0.0	0	0.0	2.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	0.8	0	0.0	0	0.0	0.0
Total	62	100.0	100.0	4,791	100.0	100.0	38	100.0	1,368	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

The bank's lending has a good distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage loans reflects excellent penetration levels, while the distribution of small business loans reflects good penetration levels.

Home Mortgage Lending

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

Lending to moderate-income borrowers was also significantly above the aggregate lending data and the demographic figure.

The borrower distribution of home mortgage loans in 2022 was below the level of performance of 2023 loans, although penetration levels to LMI borrowers were generally above the aggregate lending data and comparable to the respective demographic figures.

Table 68

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Northern Wyoming													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	\$%	\$%	#	##	##	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	7	31.8	6.6	626	23.4	3.2	4	17.4	4.9	219	8.9	2.4	20.2
Moderate	5	22.7	19.5	226	8.4	14.5	6	26.1	18.1	441	17.9	12.6	19.2
Middle	0	0.0	20.6	0	0.0	19.6	5	21.7	23.3	568	23.1	21.8	23.6
Upper	8	36.4	26.8	1,366	51.1	36.9	5	21.7	25.3	771	31.3	34.5	37.1
Unknown	2	9.1	26.5	457	17.1	25.8	3	13.0	28.5	462	18.8	28.7	0.0
Total	22	100.0	100.0	2,675	100.0	100.0	23	100.0	100.0	2,461	100.0	100.0	100.0
Refinance Loans													
Low	1	8.3	9.1	93	4.3	5.4	2	25.0	9.3	269	36.4	5.6	20.2
Moderate	2	16.7	21.7	468	21.4	16.4	5	62.5	16.3	305	41.3	10.7	19.2
Middle	2	16.7	23.7	298	13.6	22.0	0	0.0	24.4	0	0.0	25.4	23.6
Upper	5	41.7	28.5	840	38.4	37.3	1	12.5	28.8	164	22.2	32.7	37.1
Unknown	2	16.7	16.9	488	22.3	19.0	0	0.0	21.2	0	0.0	25.6	0.0
Total	12	100.0	100.0	2,187	100.0	100.0	8	100.0	100.0	738	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.5	0	0.0	6.5	1	16.7	8.7	21	5.5	7.6	20.2
Moderate	0	0.0	20.2	0	0.0	14.3	1	16.7	20.0	30	7.9	15.4	19.2
Middle	3	75.0	25.8	105	70.0	21.3	2	33.3	28.0	185	48.6	28.9	23.6
Upper	1	25.0	39.0	45	30.0	47.7	2	33.3	38.7	145	38.1	41.9	37.1
Unknown	0	0.0	7.5	0	0.0	10.3	0	0.0	4.7	0	0.0	6.3	0.0
Total	4	100.0	100.0	150	100.0	100.0	6	100.0	100.0	381	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	19.0	7.5	719	13.1	4.0	9	21.4	6.4	569	15.1	3.2	20.2
Moderate	7	16.7	20.0	694	12.6	14.9	13	31.0	17.6	812	21.6	12.2	19.2
Middle	7	16.7	21.7	593	10.8	20.2	7	16.7	24.2	753	20.0	22.6	23.6
Upper	16	38.1	28.2	2,551	46.4	37.5	10	23.8	27.1	1,165	31.0	34.5	37.1
Unknown	4	9.5	22.6	945	17.2	23.4	3	7.1	24.7	462	12.3	27.6	0.0
Total	42	100.0	100.0	5,502	100.0	100.0	42	100.0	100.0	3,761	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is good. The distribution of loans to small businesses in 2022 was above the aggregate lending data by number volume and comparable by dollar volume and reflected a comparable concentration of lending relative to the demographic figure of the percentage of small businesses.

The distribution of loans to small businesses in 2023 reflected consistent performance to that of 2022 lending levels.

Table 69

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Northern Wyoming											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	49	79.0	51.0	1,364	28.5	39.0	30	78.9	448	32.7	92.7
Over \$1 Million	13	21.0		3,427	71.5		8	21.1	920	67.3	4.5
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	2.8
Total	62	100.0		4,791	100.0		38	100.0	1,368	100.0	100.0
By Loan Size											
\$100,000 or Less	52	83.9	96.8	718	15.0	58.4	35	92.1	583	42.6	
\$100,001 - \$250,000	4	6.5	2.0	569	11.9	14.5	2	5.3	285	20.8	
\$250,001 - \$1 Million	6	9.7	1.2	3,504	73.1	27.1	1	2.6	500	36.5	
Total	62	100.0	100.0	4,791	100.0	100.0	38	100.0	1,368	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	45	91.8		433	31.7		29	96.7	338	75.4	
\$100,001 - \$250,000	2	4.1		269	19.7		1	3.3	110	24.6	
\$250,001 - \$1 Million	2	4.1		662	48.5		0	0.0	0	0.0	
Total	49	100.0		1,364	100.0		30	100.0	448	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Community Development Lending

The bank makes a relatively high level of CD loans in the AA. The bank originated five CD loans totaling \$10.1MM in this AA, which were responsive to area economic development needs and revitalization and stabilization needs. It is noted that the level of CD lending in the AA reflects lower performance than several other AAs analyzed for full-scope review; however, the rural and sparsely populated composition of the AA limits the opportunity to originate CD loans when compared to larger metropolitan areas in which the bank has operations. The composition of CD lending in the AA includes:

- Two loans totaling \$10.0MM provided financing for an area small business that provides stable employment for a majority LMI workforce.
- Three loans totaling \$90.0M provided ongoing funding to an agricultural cooperative and are considered responsive to area revitalization and stabilization needs. The financing benefitted an area agricultural cooperative of farmers that maintain sections of Washakie County to ensure critical maintenance needs are completed for the benefit of a rural, underserved area.

Table 70

Community Development Loans – Northern Wyoming AA		
Community Development Purpose	#	\$(000)
Affordable Housing	0	0
Community Services	0	0
Economic Development	2	10,000
Revitalization and Stabilization	3	90
Total Loans	5	10,090

INVESTMENT TEST

The bank's performance under the investment test in the Northern Wyoming AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of qualified investment activities include:

- Fifteen MBS investments that remain in the bank's portfolio from prior periods which were comprised of \$2.2MM in underlying loans inside the AA that enabled LMI individuals and families to obtain affordable housing.
- A total of \$8.0M in donations provided to an area community services organization that provides an array of services to LMI individuals, with a primary focus on services for youth from disadvantaged households.

Table 71

Investments, Grants, and Donations – Northern Wyoming AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	15	2,155	0	0	2	1	17	2,156
Community Services	0	0	0	0	27	26	27	26
Economic Development	0	0	0	0	4	4	4	4
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	15	2,155	0	0	33	32	48	2,187
^{1.} Book Value of Investment								
^{2.} Original Market Value of Investment								

SERVICE TEST

The bank's performance under the service test in the Northern Wyoming AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-thru facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates three full-service branches in the AA, including one office in a moderate-income tract and two offices in middle-income tracts. Each office has a full lobby, drive-thru facilities, and contains cash dispensing-only ATMs on the premises.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There have been no changes to the bank's branch structure in the AA since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours along with products and services do not vary materially by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday through Friday.

Table 72

Retail Banking and Community Development Services – Northern Wyoming AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	66.7	0.0	0.0	100.0	0.0	22.9	71.4	5.7	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts ¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	66.7	0.0	0.0	100.0	0.0	22.5	70.1	7.4	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	3		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	3		9		0		0		12		9	
^{1.} Based on 2023 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank is a leader in providing CD services. Bank staff provided a total of 12 CD services to nine organizations and donated 284 hours of time during the evaluation period. Examples of CD services include:

- A bank officer served on the board of an organization that provides education, mentoring, and crisis support for youth from disadvantaged households.
- Another bank officer served on the board of an area organization that provides affordable housing services to area LMI individuals and families.

**ALBANY COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's AA is comprised of Albany County in its entirety, which is located in the southeast corner of Wyoming. Refer to Appendix C for an AA map and Appendix E for additional information on the bank's lending performance within the AA.

- The bank's AA remains unchanged since the prior evaluation.
- The AA is composed of 11 census tracts, including 2 moderate-, 7 middle-, 1 upper-, and 1 unknown-income census tract(s). This represents a change from the prior evaluation when the AA had 10 total census tracts, including 2 low-, 1 moderate-, and 7 middle-income census tracts.
- The bank operates one full-service branch in the AA in a middle-income census tract, with lobby and drive-thru access, as well as an ATM.
- According to 2020 Census data, the AA population was 37,066.
- According to the June 30, 2023 FDIC Deposit Market Share Report, the bank held 28.0 percent market share of deposits in the AA, ranking 2nd of 7 FDIC-insured depository institutions operating from 7 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ALBANY COUNTY AA

The state of Wyoming nonmetropolitan 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 in this area do not change the rating for the state of Wyoming.

Table 73

Assessment Area	Lending Test	Investment Test	Service Test
Albany County	Below	Consistent	Consistent

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination			
<u>Financial Institution</u> ANB Bank Denver, Colorado		<u>Products/Services Reviewed</u> <div><div>• Home Purchase Loans</div><div>• Home Refinance Loans</div><div>• Home Improvement Loans</div><div>• Multifamily Loans</div></div> <div><div>• Small Business (SB) Loans</div><div>• Small Farm (SF) Loans</div><div>• Community Development Loans</div><div>• Qualified Investments and Donations</div><div>• Community Development Services</div></div>	
<u>Time Period</u> <div><div>HMDA LAR and CRA SB and SF Loans:</div><div>January 1, 2022 to December 31, 2023</div></div> <div><div>Community Development Activities:</div><div>January 1, 2022 to December 31, 2023</div></div>			
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Colorado</u> Denver MSA Colorado Springs MSA Fort Collins MSA Grand Junction MSA Boulder MSA Mountain Colorado AA San Miguel County AA	Full Review Full Review Limited Review Limited Review Limited Review Full Review Limited Review	None None None None None None None	1 Prior 1 Prior None None None 1 Current None
<u>Wyoming</u> Cheyenne MSA Casper MSA Northern Wyoming AA Albany County AA	Full Review Limited Review Full Review Limited Review	None None None None	2 Current None 1 Prior None

APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

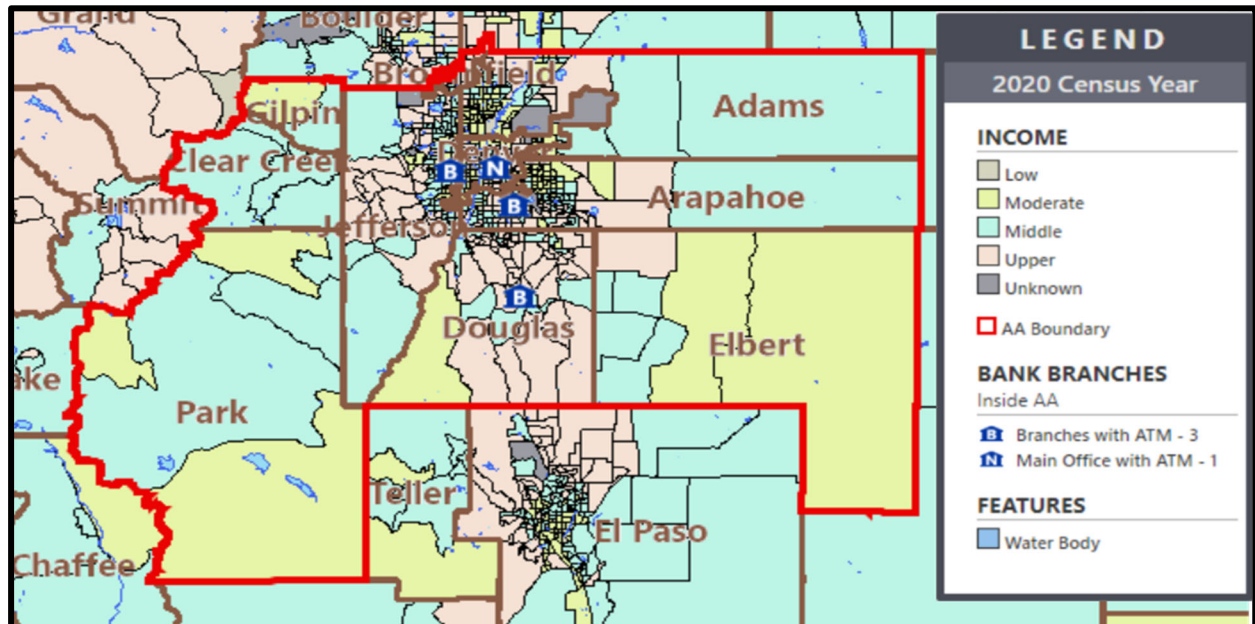
State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Colorado	Outstanding	Outstanding	Outstanding	Outstanding
Wyoming	High Satisfactory	Outstanding	Outstanding	Outstanding

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

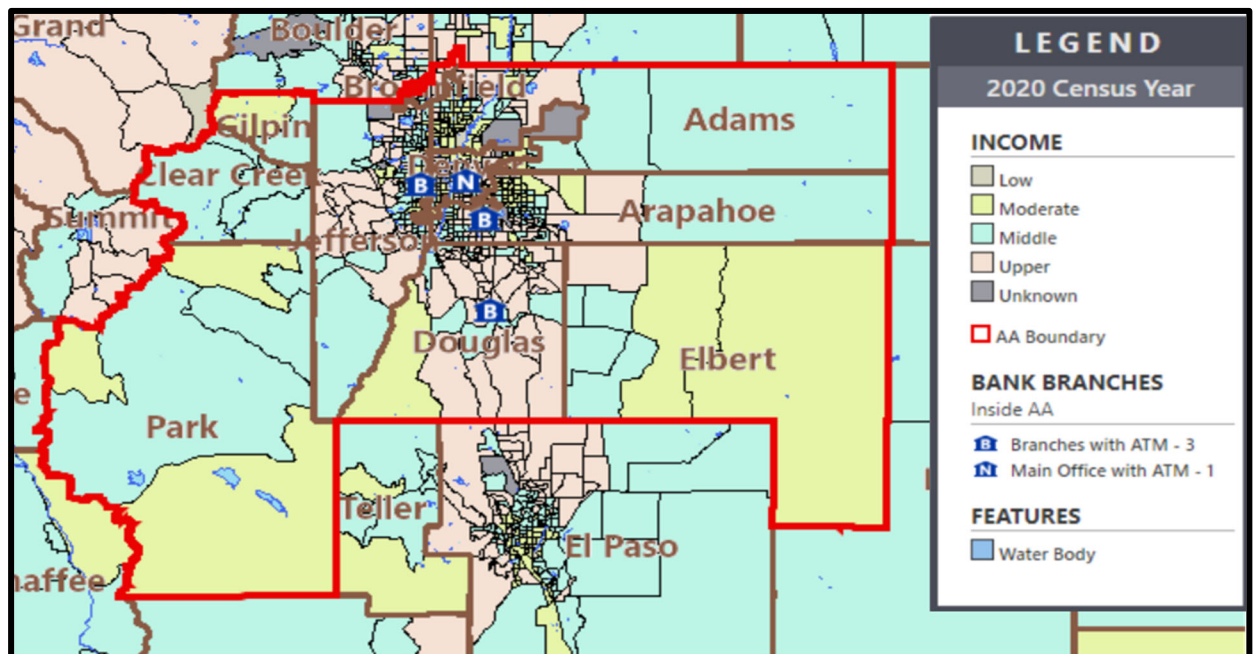
Colorado

Denver MSA AA

2023

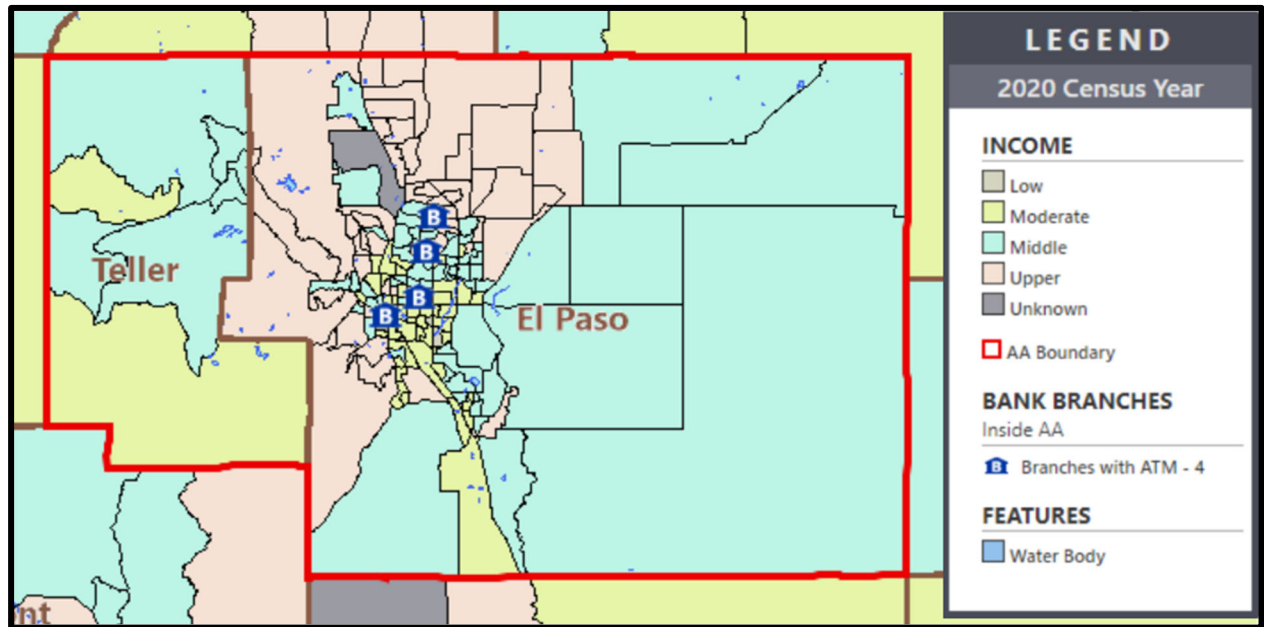


2022

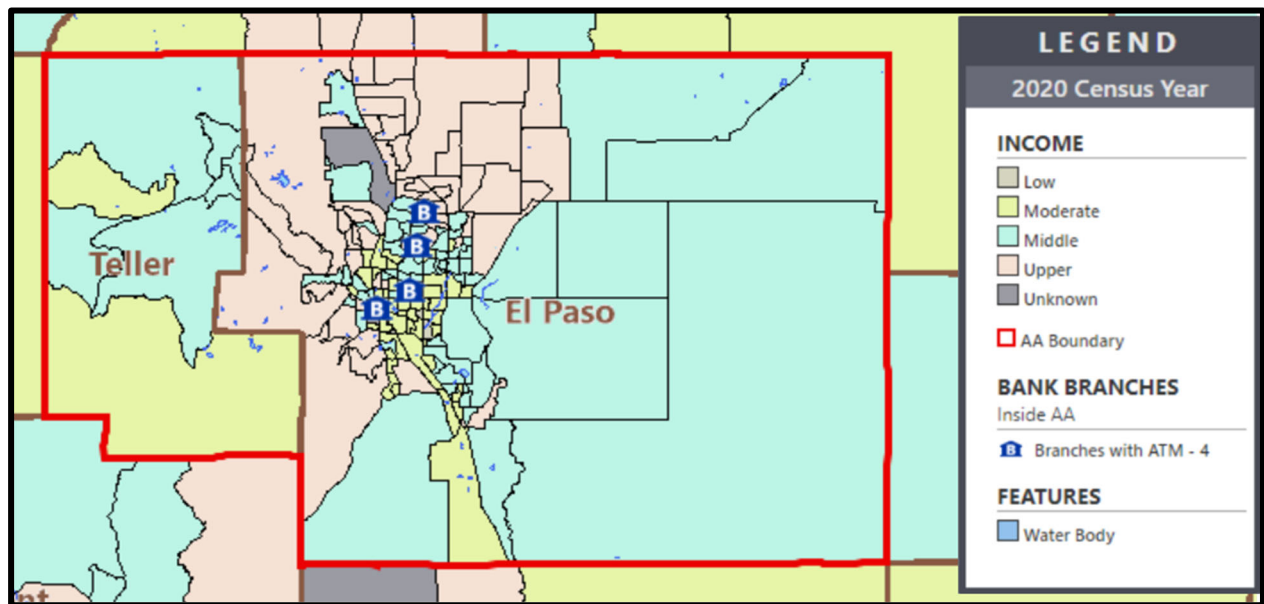


Colorado Springs MSA AA

2023

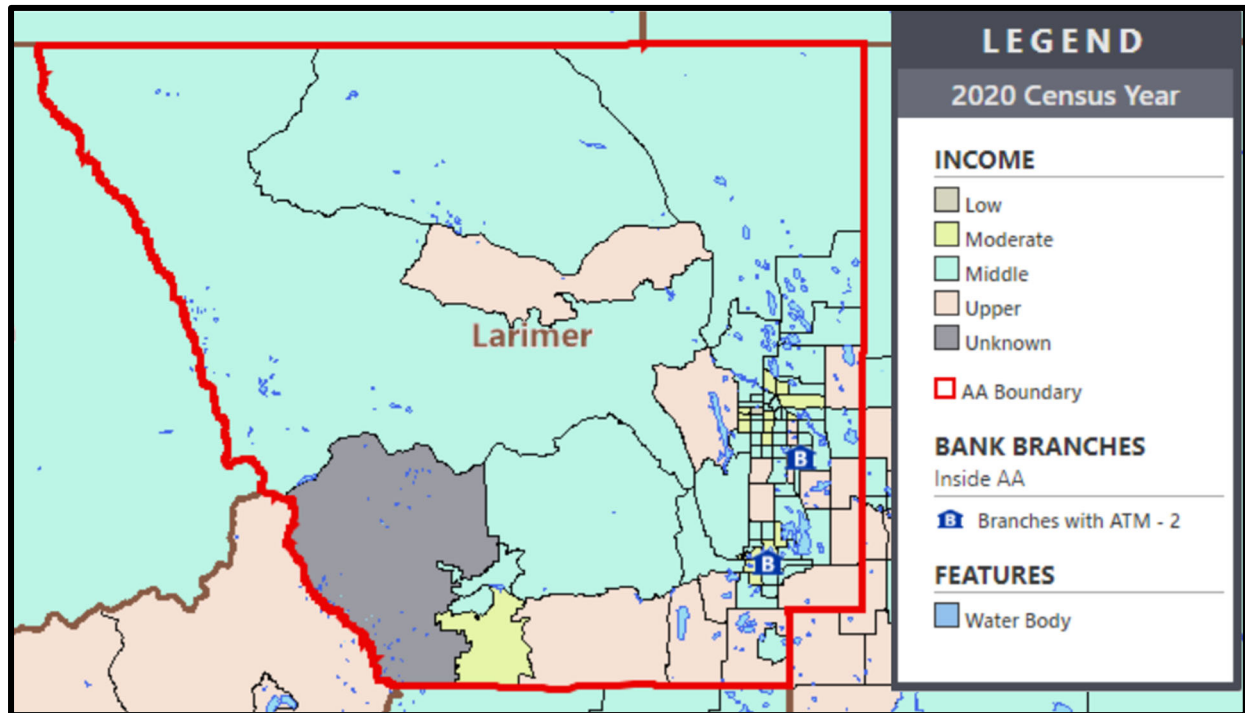


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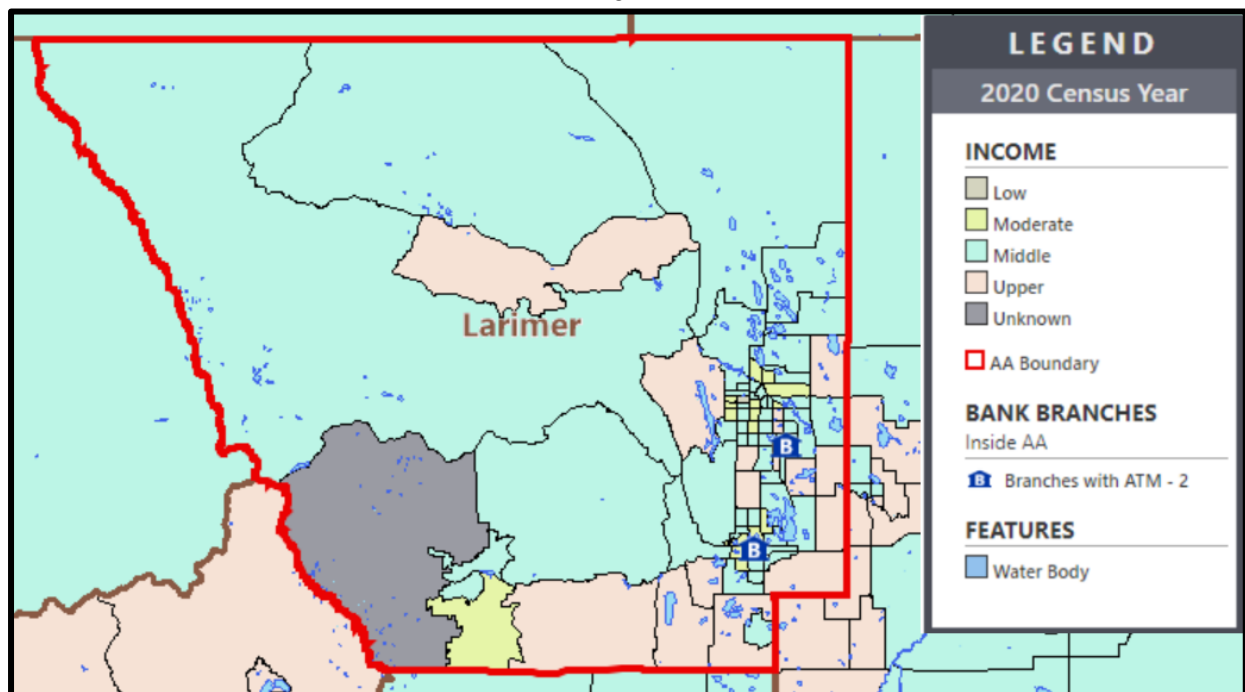


Fort Collins MSAAA

2023

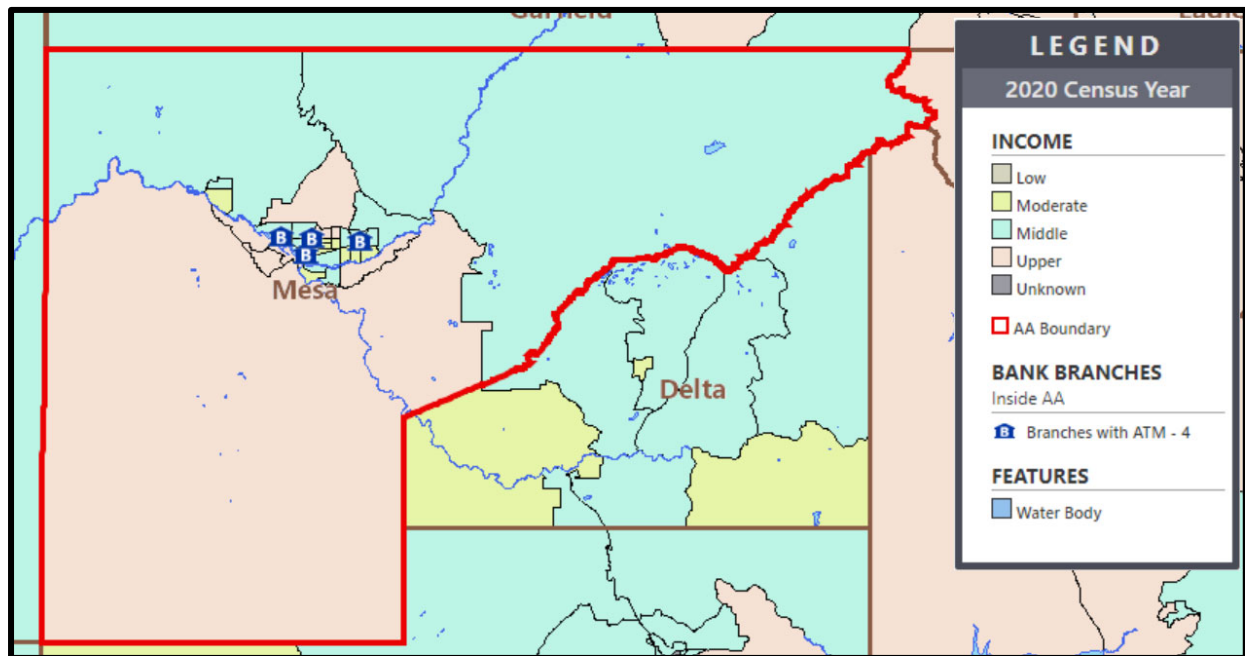


2022

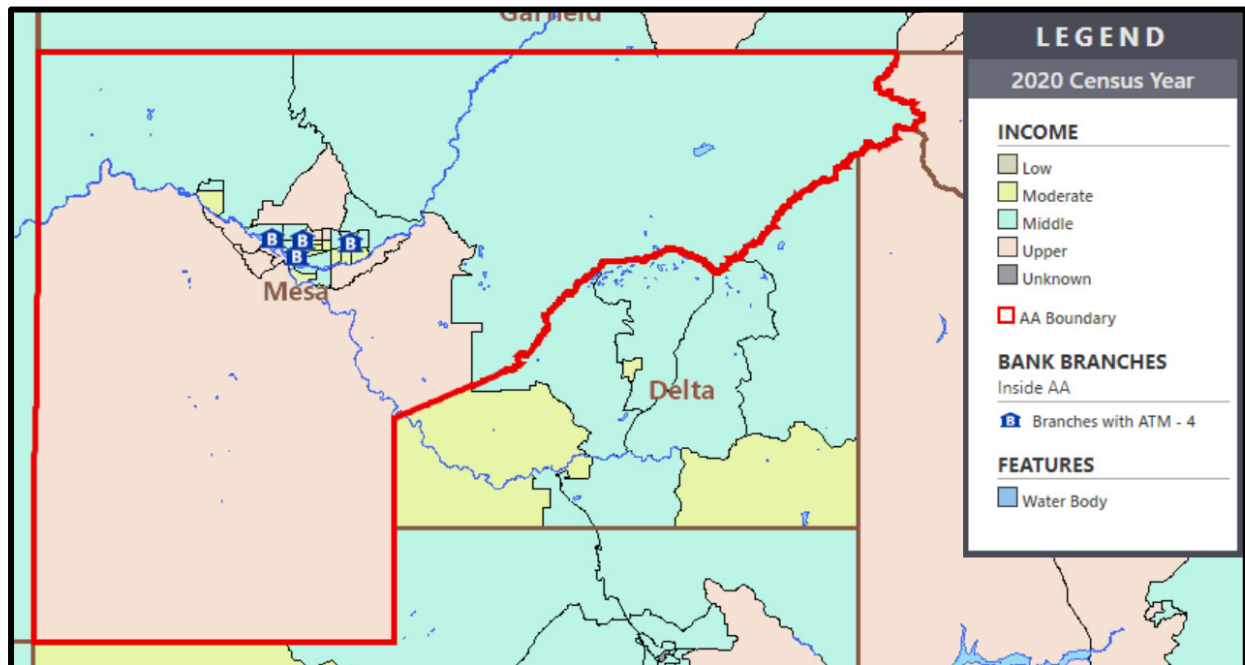


Grand Junction MSA AA

2023

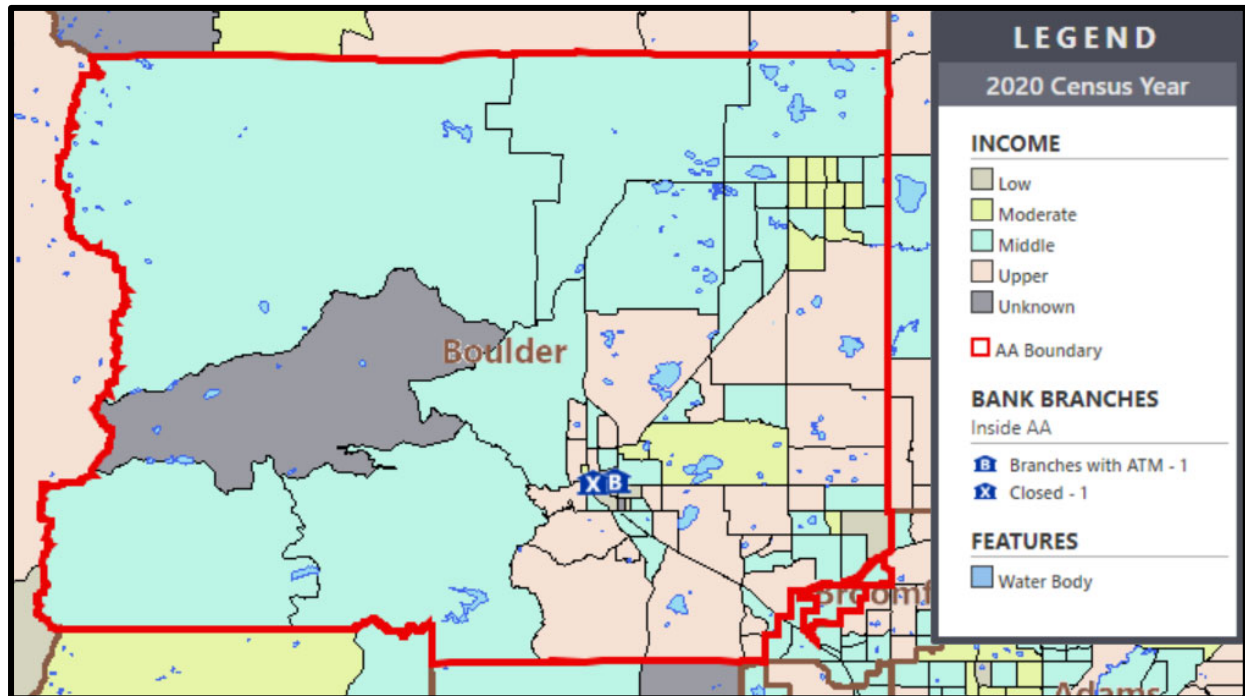


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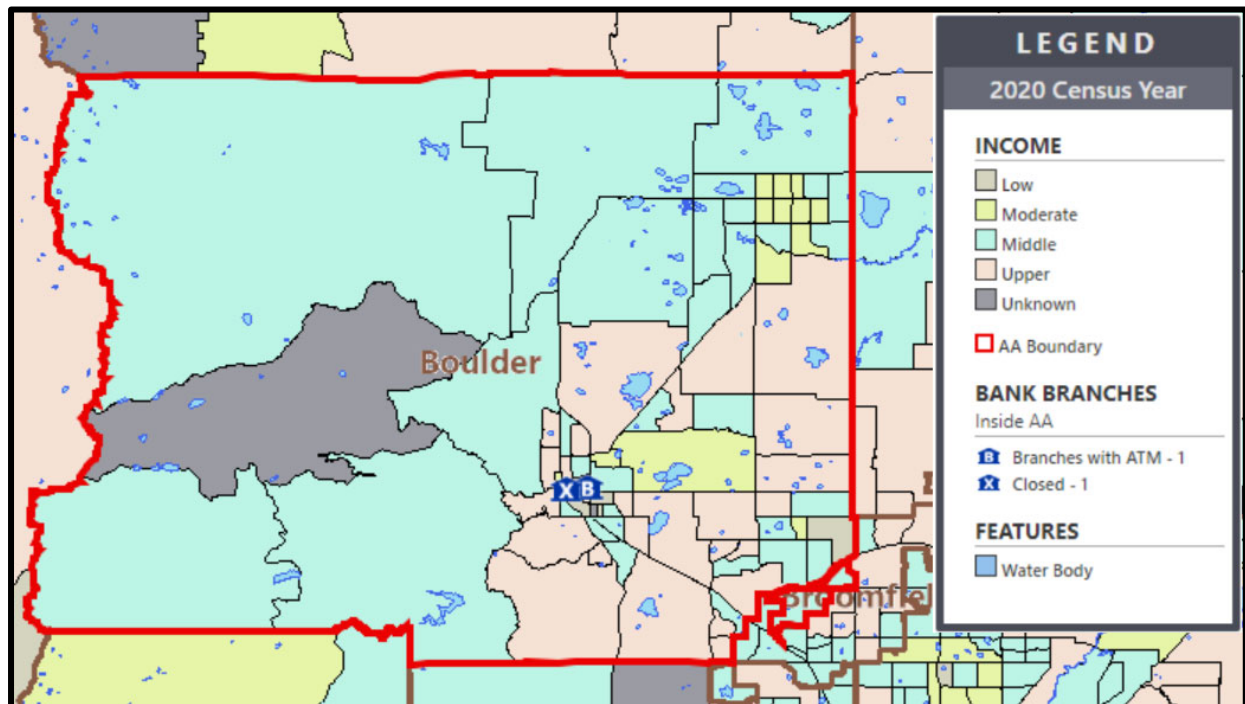


Boulder MSAAA

2023

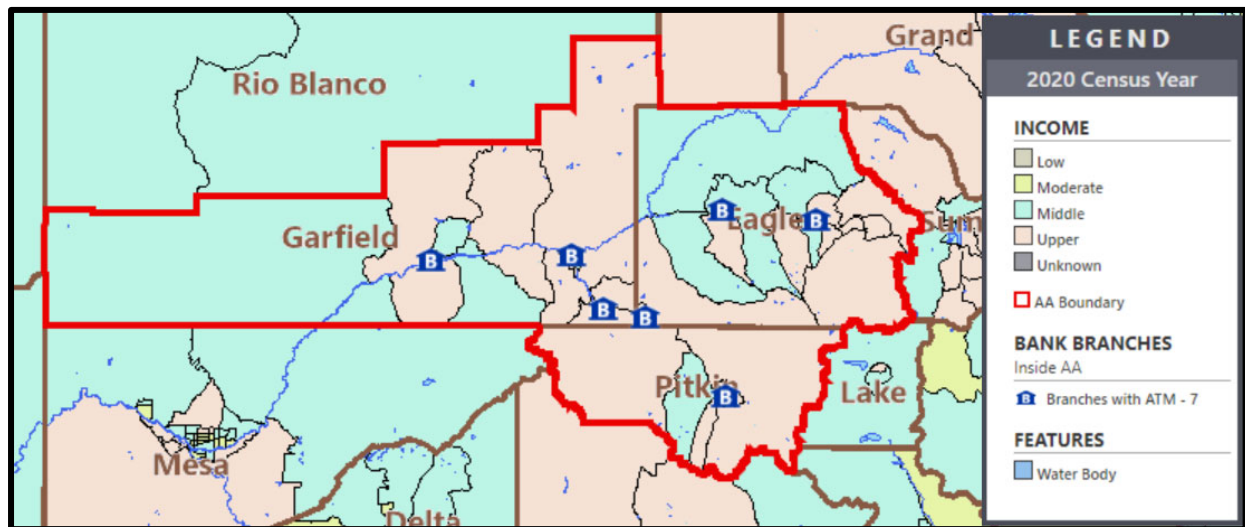


2022

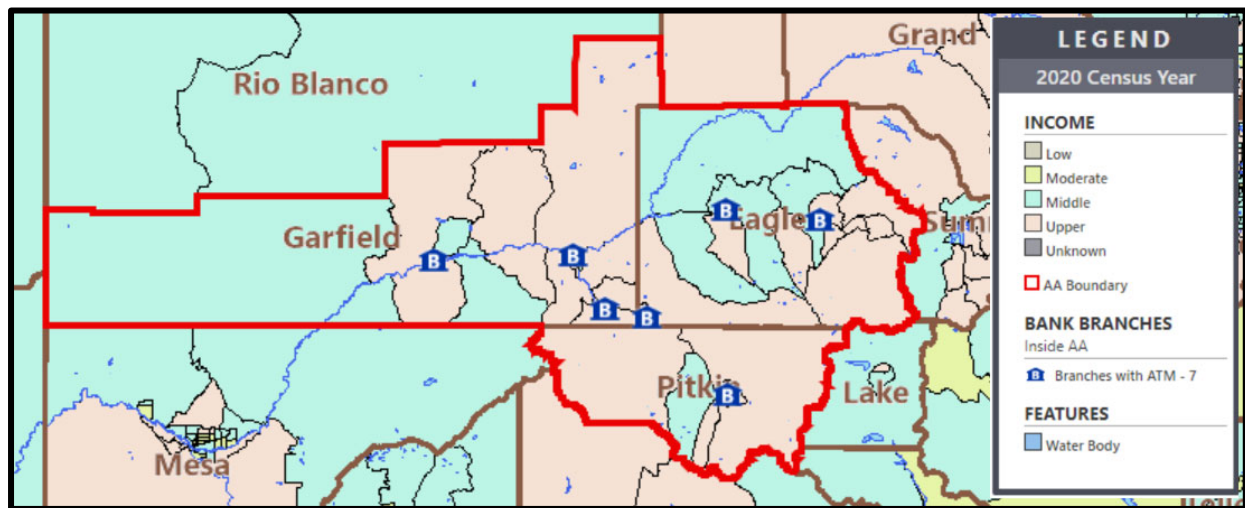


Mountain Colorado AA

2023

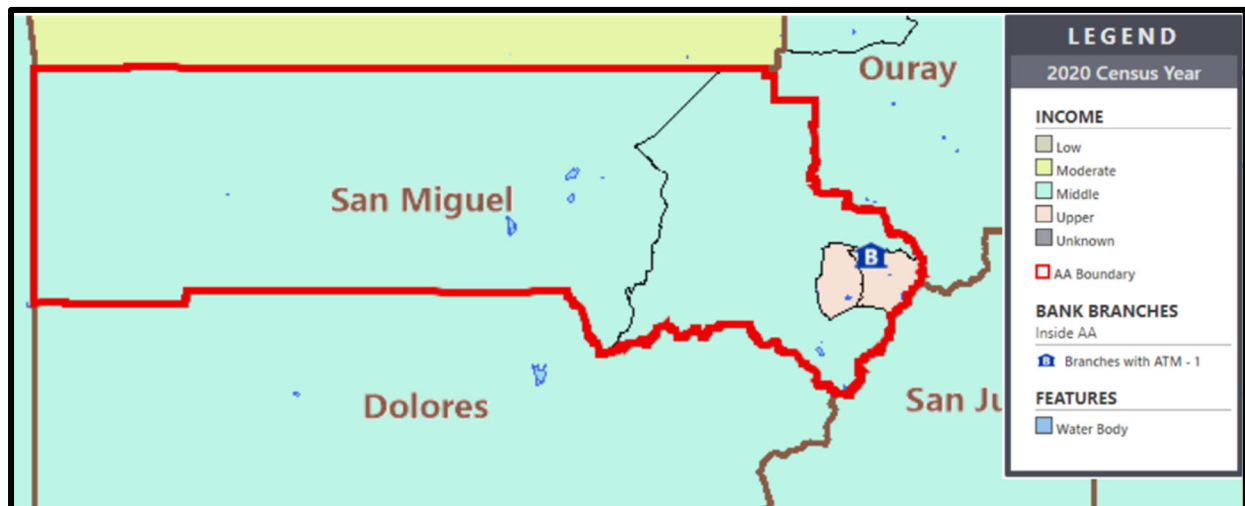


2022

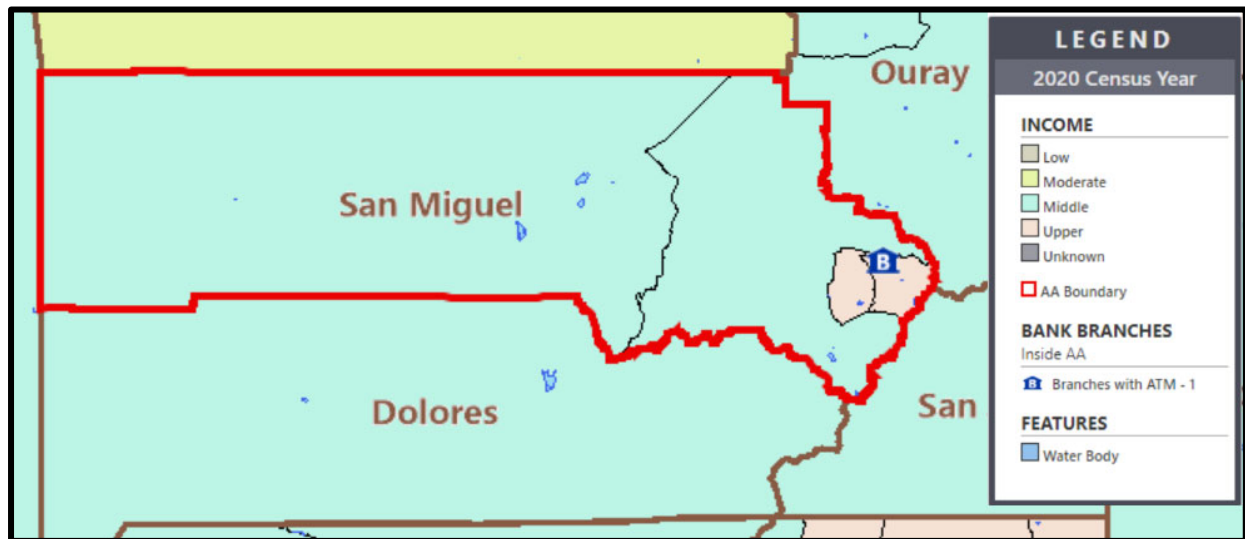


San Miguel County AA

2023



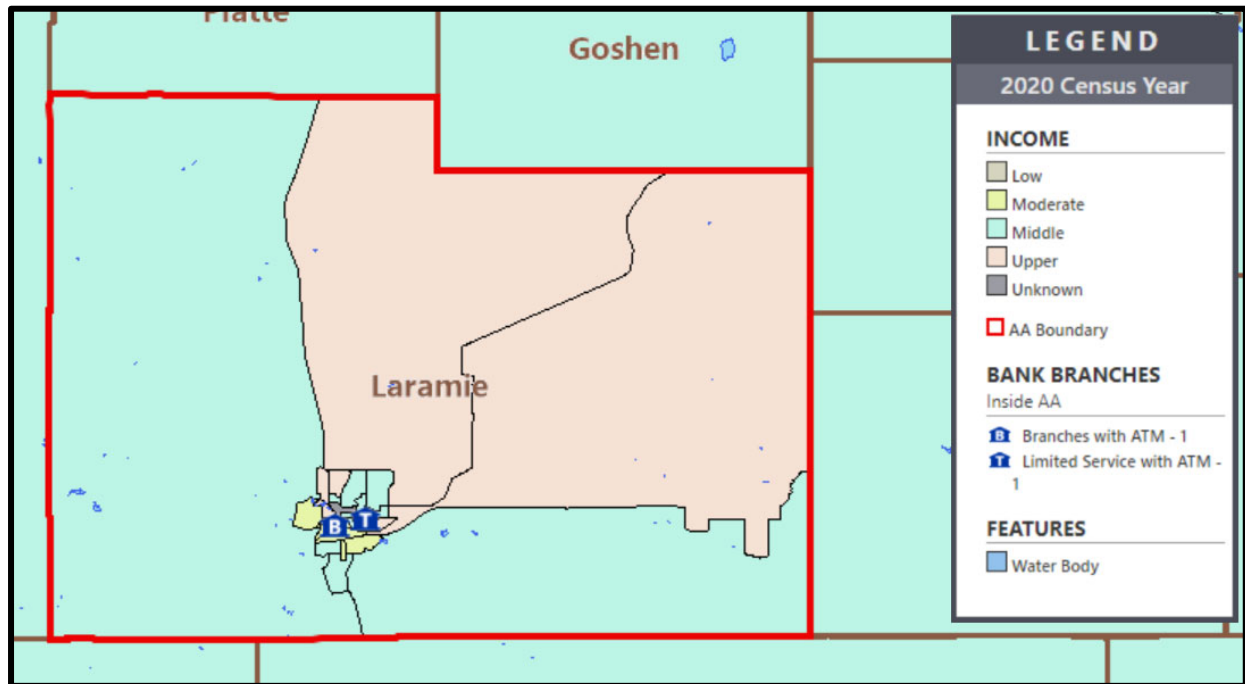
2022



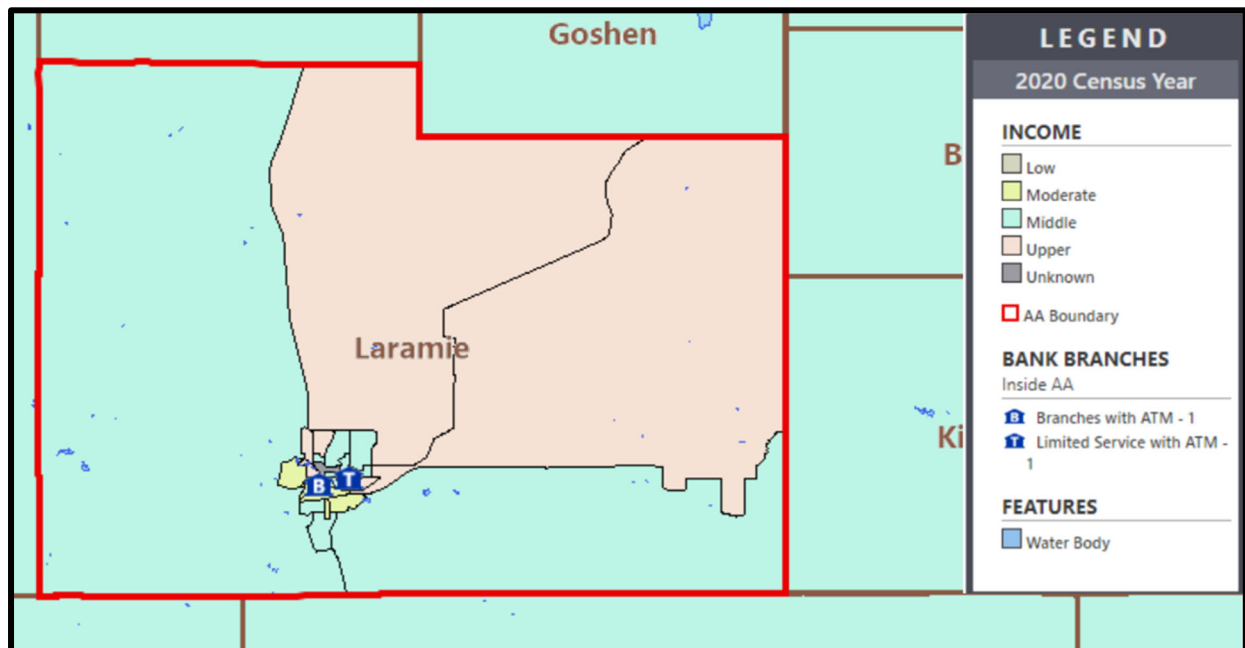
Wyoming

Cheyenne MSA AA

2023

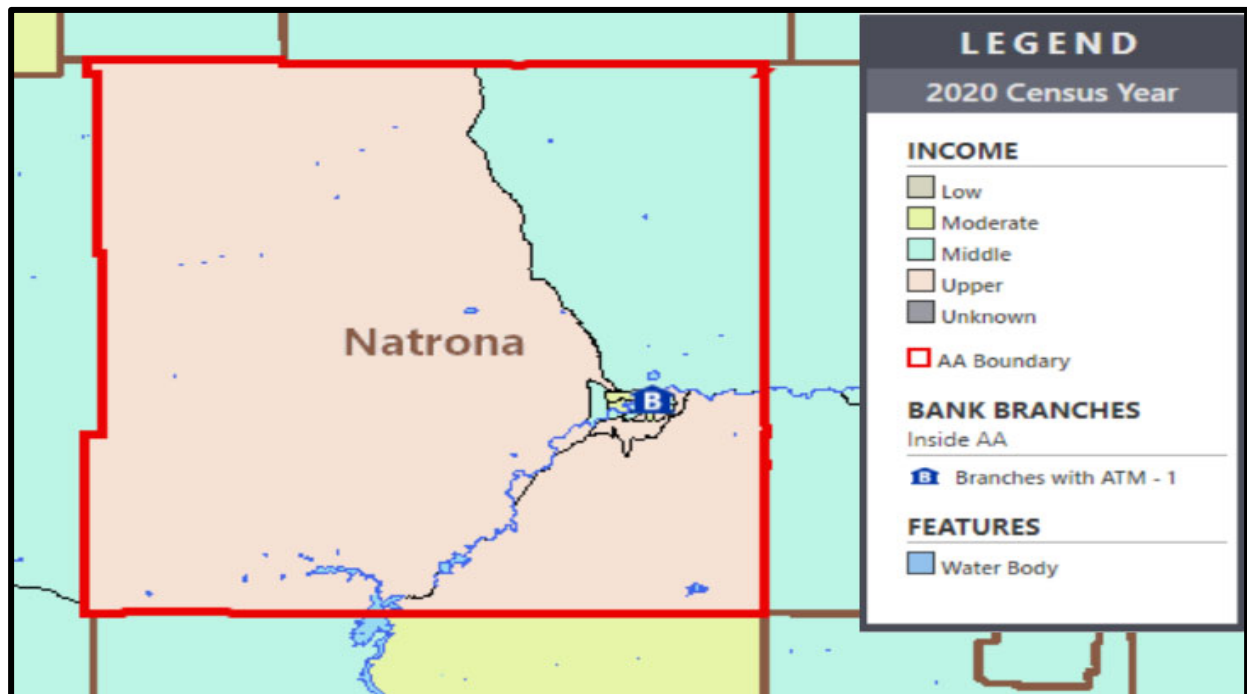


2022

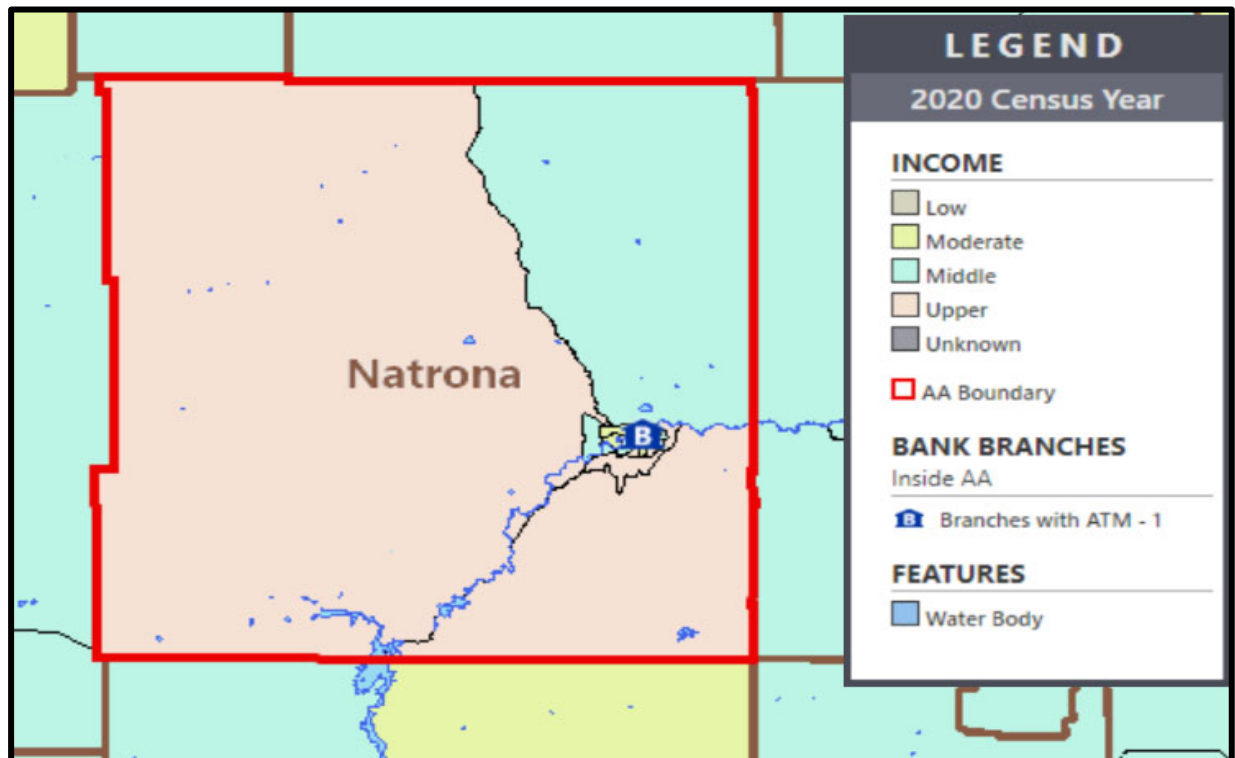


Casper MSA AA

2023

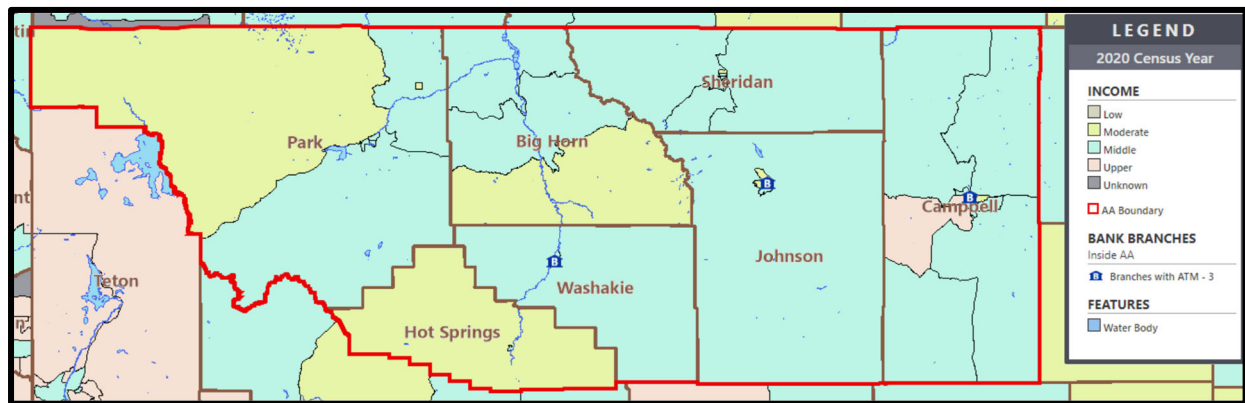


2022

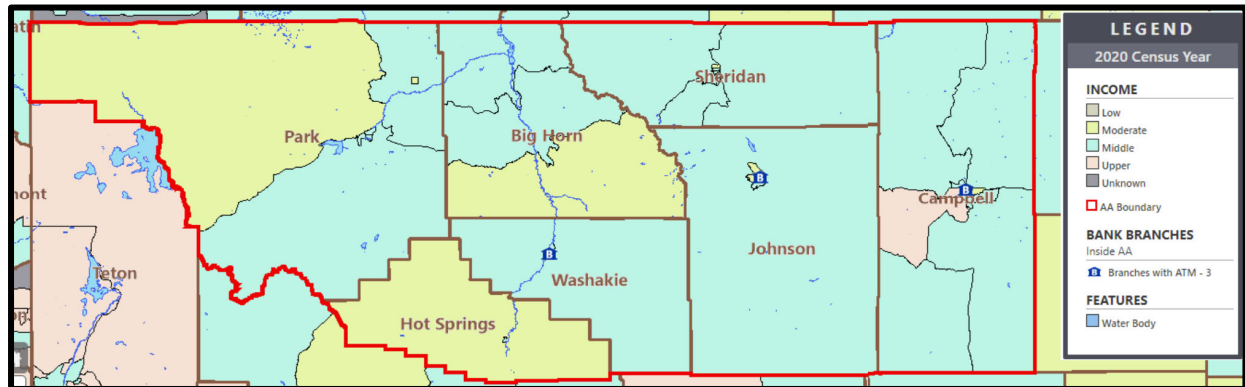


Northern Wyoming AA

2023

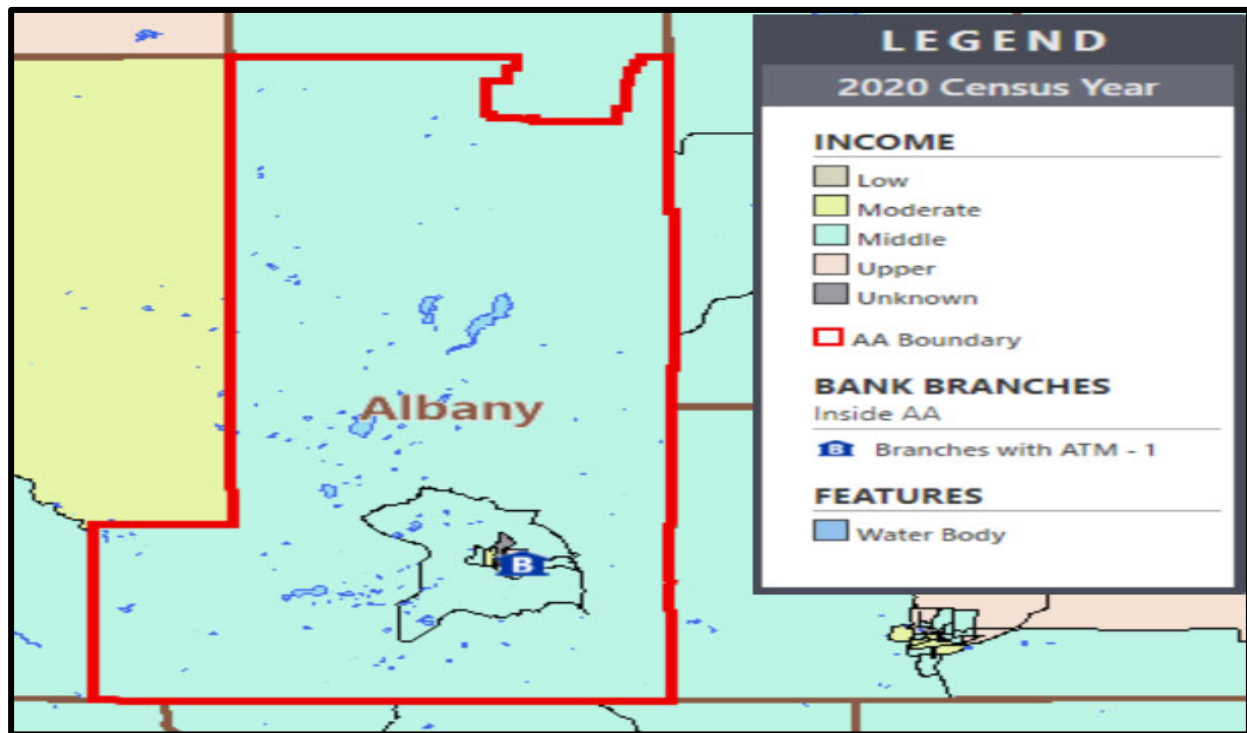


2022

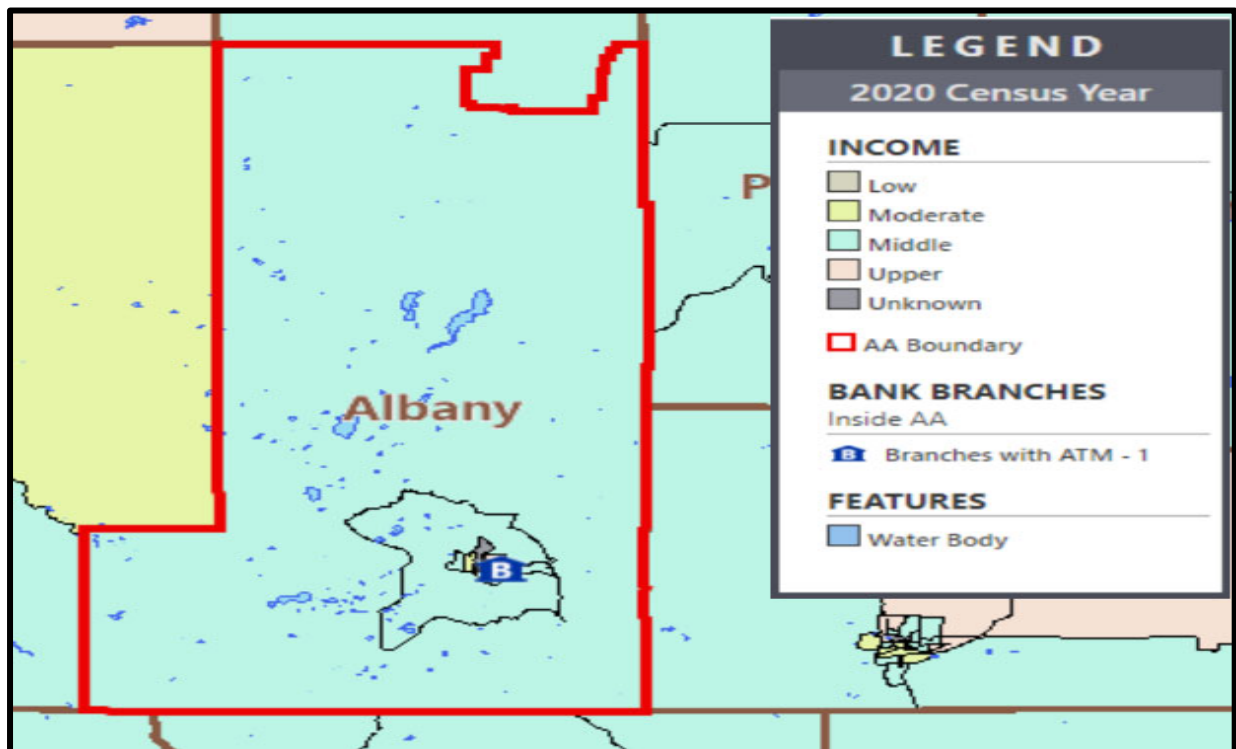


Albany County AA

2023



2022



APPENDIX D – DEMOGRAPHIC INFORMATION

Denver MSA AA

Table D-1

2023 Denver MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	37	5.2	30,100	4.4	5,968	19.8	138,836	20.2
Moderate	179	25.3	169,549	24.7	15,695	9.3	124,952	18.2
Middle	258	36.5	243,634	35.5	9,052	3.7	150,661	21.9
Upper	214	30.3	239,625	34.9	4,840	2.0	272,611	39.7
Unknown	19	2.7	4,152	0.6	1,042	25.1	0	0.0
Total AA	707	100.0	687,060	100.0	36,597	5.3	687,060	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	57,872	20,206	2.8	34.9	34,769	60.1	2,897	5.0
Moderate	310,340	150,923	21.2	48.6	140,625	45.3	18,792	6.1
Middle	419,202	267,466	37.6	63.8	130,534	31.1	21,202	5.1
Upper	356,031	269,287	37.9	75.6	71,619	20.1	15,125	4.2
Unknown	13,303	3,327	0.5	25.0	8,918	67.0	1,058	8.0
Total AA	1,156,748	711,209	100.0	61.5	386,465	33.4	59,074	5.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,430	4.1	6,656	4.0	715	6.5	59	3.4
Moderate	38,104	21.2	35,179	21.1	2,669	24.4	256	14.8
Middle	61,765	34.4	58,116	34.9	3,101	28.3	548	31.6
Upper	67,189	37.5	62,676	37.6	3,723	34.0	790	45.6
Unknown	4,905	2.7	4,075	2.4	750	6.8	80	4.6
Total AA	179,393	100.0	166,702	100.0	10,958	100.0	1,733	100.0
Percentage of Total Businesses:				92.9		6.1		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	2.4	37	2.1	6	22.2	0	0.0
Moderate	344	18.8	336	18.7	8	29.6	0	0.0
Middle	715	39.1	713	39.6	2	7.4	0	0.0
Upper	689	37.7	680	37.8	9	33.3	0	0.0
Unknown	37	2.0	35	1.9	2	7.4	0	0.0
Total AA	1,828	100.0	1,801	100.0	27	100.0	0	0.0
Percentage of Total Farms:				98.5		1.5		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-2

2022 Denver MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	37	5.2	30,100	4.4	5,968	19.8	138,836	20.2
Moderate	179	25.3	169,549	24.7	15,695	9.3	124,952	18.2
Middle	258	36.5	243,634	35.5	9,052	3.7	150,661	21.9
Upper	214	30.3	239,625	34.9	4,840	2.0	272,611	39.7
Unknown	19	2.7	4,152	0.6	1,042	25.1	0	0.0
Total AA	707	100.0	687,060	100.0	36,597	5.3	687,060	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	57,872	20,206	2.8	34.9	34,769	60.1	2,897	5.0
Moderate	310,340	150,923	21.2	48.6	140,625	45.3	18,792	6.1
Middle	419,202	267,466	37.6	63.8	130,534	31.1	21,202	5.1
Upper	356,031	269,287	37.9	75.6	71,619	20.1	15,125	4.2
Unknown	13,303	3,327	0.5	25.0	8,918	67.0	1,058	8.0
Total AA	1,156,748	711,209	100.0	61.5	386,465	33.4	59,074	5.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,432	4.1	6,659	3.9	716	6.3	57	3.1
Moderate	38,380	21.1	35,373	20.9	2,735	24.2	272	14.6
Middle	62,538	34.3	58,774	34.8	3,183	28.2	581	31.3
Upper	68,403	37.5	63,710	37.7	3,840	34.0	853	45.9
Unknown	5,475	3.0	4,551	2.7	830	7.3	94	5.1
Total AA	182,228	100.0	169,067	100.0	11,304	100.0	1,857	100.0
Percentage of Total Businesses:				92.8		6.2		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	45	2.5	40	2.2	5	17.2	0	0.0
Moderate	341	18.7	333	18.5	8	27.6	0	0.0
Middle	714	39.1	710	39.5	4	13.8	0	0.0
Upper	688	37.7	679	37.8	9	31.0	0	0.0
Unknown	39	2.1	36	2.0	3	10.3	0	0.0
Total AA	1,827	100.0	1,798	100.0	29	100.0	0	0.0
Percentage of Total Farms:				98.4		1.6		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Colorado Springs MSA

Table D-3

2023 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	2.3	3,334	1.8	875	26.2	34,957	18.8
Moderate	48	27.4	44,074	23.7	5,829	13.2	34,861	18.8
Middle	72	41.1	77,514	41.7	4,058	5.2	40,722	21.9
Upper	49	28.0	60,481	32.6	1,266	2.1	75,172	40.5
Unknown	2	1.1	309	0.2	26	8.4	0	0.0
Total AA	175	100.0	185,712	100.0	12,054	6.5	185,712	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,745	2,150	1.2	37.4	3,354	58.4	241	4.2
Moderate	80,756	35,922	20.0	44.5	38,853	48.1	5,981	7.4
Middle	119,893	77,994	43.4	65.1	35,906	29.9	5,993	5.0
Upper	82,452	63,375	35.2	76.9	14,775	17.9	4,302	5.2
Unknown	962	456	0.3	47.4	455	47.3	51	5.3
Total AA	289,808	179,897	100.0	62.1	93,343	32.2	16,568	5.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	450	1.2	417	1.1	26	1.5	7	2.3
Moderate	10,522	27.4	9,746	26.8	686	39.6	90	29.1
Middle	14,493	37.7	13,918	38.2	486	28.0	89	28.8
Upper	12,721	33.1	12,095	33.2	504	29.1	122	39.5
Unknown	268	0.7	236	0.6	31	1.8	1	0.3
Total AA	38,454	100.0	36,412	100.0	1,733	100.0	309	100.0
Percentage of Total Businesses:				94.7		4.5		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	96	21.1	92	20.6	4	44.4	0	0.0
Middle	220	48.4	218	48.9	2	22.2	0	0.0
Upper	133	29.2	130	29.1	3	33.3	0	0.0
Unknown	5	1.1	5	1.1	0	0.0	0	0.0
Total AA	455	100.0	446	100.0	9	100.0	0	0.0
Percentage of Total Farms:				98.0		2.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table D-4

2022 Colorado Springs MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	2.3	3,334	1.8	875	26.2	34,957	18.8
Moderate	48	27.4	44,074	23.7	5,829	13.2	34,861	18.8
Middle	72	41.1	77,514	41.7	4,058	5.2	40,722	21.9
Upper	49	28.0	60,481	32.6	1,266	2.1	75,172	40.5
Unknown	2	1.1	309	0.2	26	8.4	0	0.0
Total AA	175	100.0	185,712	100.0	12,054	6.5	185,712	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,745	2,150	1.2	37.4	3,354	58.4	241	4.2
Moderate	80,756	35,922	20.0	44.5	38,853	48.1	5,981	7.4
Middle	119,893	77,994	43.4	65.1	35,906	29.9	5,993	5.0
Upper	82,452	63,375	35.2	76.9	14,775	17.9	4,302	5.2
Unknown	962	456	0.3	47.4	455	47.3	51	5.3
Total AA	289,808	179,897	100.0	62.1	93,343	32.2	16,568	5.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	472	1.2	434	1.2	30	1.7	8	2.4
Moderate	10,546	27.2	9,756	26.6	697	39.5	93	28.3
Middle	14,555	37.5	13,976	38.1	485	27.5	94	28.6
Upper	12,952	33.4	12,298	33.5	521	29.6	133	40.4
Unknown	285	0.7	254	0.7	30	1.7	1	0.3
Total AA	38,810	100.0	36,718	100.0	1,763	100.0	329	100.0
Percentage of Total Businesses:				94.6		4.5		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	95	20.6	91	20.1	4	50.0	0	0.0
Middle	222	48.2	220	48.6	2	25.0	0	0.0
Upper	138	29.9	136	30.0	2	25.0	0	0.0
Unknown	5	1.1	5	1.1	0	0.0	0	0.0
Total AA	461	100.0	453	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Mountain Colorado

Table D-5

2023 Mountain Colorado 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	3,732	11.9
Moderate	1	2.9	711	2.3	100	14.1	4,075	13.0
Middle	11	32.4	11,701	37.4	550	4.7	6,705	21.4
Upper	22	64.7	18,870	60.3	861	4.6	16,770	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	31,282	100.0	1,511	4.8	31,282	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,326	398	1.2	17.1	787	33.8	1,141	49.1
Middle	25,041	12,097	37.1	48.3	5,391	21.5	7,553	30.2
Upper	42,615	20,099	61.7	47.2	8,905	20.9	13,611	31.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	69,982	32,594	100.0	46.6	15,083	21.6	22,305	31.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	232	2.5	202	2.4	27	4.0	3	2.6
Middle	2,589	27.6	2,360	27.5	203	30.0	26	22.2
Upper	6,555	69.9	6,021	70.2	446	66.0	88	75.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,376	100.0	8,583	100.0	676	100.0	117	100.0
Percentage of Total Businesses:				91.5		7.2		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	99	41.1	96	40.5	2	66.7	1	100.0
Upper	142	58.9	141	59.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	241	100.0	237	100.0	3	100.0	1	100.0
Percentage of Total Farms:				98.3		1.2		0.4
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-6

2022 Mountain Colorado 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	3,732	11.9
Moderate	1	2.9	711	2.3	100	14.1	4,075	13.0
Middle	11	32.4	11,701	37.4	550	4.7	6,705	21.4
Upper	22	64.7	18,870	60.3	861	4.6	16,770	53.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	31,282	100.0	1,511	4.8	31,282	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,326	398	1.2	17.1	787	33.8	1,141	49.1
Middle	25,041	12,097	37.1	48.3	5,391	21.5	7,553	30.2
Upper	42,615	20,099	61.7	47.2	8,905	20.9	13,611	31.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	69,982	32,594	100.0	46.6	15,083	21.6	22,305	31.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	225	2.4	195	2.3	28	4.1	2	1.7
Middle	2,606	27.7	2,379	27.7	203	29.4	24	20.0
Upper	6,575	69.9	6,021	70.1	460	66.6	94	78.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,406	100.0	8,595	100.0	691	100.0	120	100.0
Percentage of Total Businesses:				91.4		7.3		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	96	40.3	92	39.5	2	66.7	2	100.0
Upper	142	59.7	141	60.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	238	100.0	233	100.0	3	100.0	2	100.0
Percentage of Total Farms:				97.9		1.3		0.8
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Cheyenne MSA

Table D-7

2023 Cheyenne MSA 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	4,533	17.3
Moderate	6	22.2	4,199	16.1	425	10.1	4,680	17.9
Middle	14	51.9	13,888	53.2	786	5.7	6,531	25.0
Upper	6	22.2	8,041	30.8	296	3.7	10,384	39.7
Unknown	1	3.7	0	0.0	0	0.0	0	0.0
Total AA	27	100.0	26,128	100.0	1,507	5.8	26,128	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,135	3,289	11.3	40.4	4,023	49.5	823	10.1
Middle	24,200	16,641	57.1	68.8	5,423	22.4	2,136	8.8
Upper	11,506	9,239	31.7	80.3	1,587	13.8	680	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	43,841	29,169	100.0	66.5	11,033	25.2	3,639	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3,037	47.6	2,741	46.8	191	55.8	105	58.3
Middle	2,198	34.5	2,049	35.0	99	28.9	50	27.8
Upper	1,126	17.7	1,052	18.0	50	14.6	24	13.3
Unknown	18	0.3	15	0.3	2	0.6	1	0.6
Total AA	6,379	100.0	5,857	100.0	342	100.0	180	100.0
Percentage of Total Businesses:				91.8		5.4		2.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	4.0	7	4.1	0	0.0	0	0.0
Middle	77	44.0	76	44.2	1	33.3	0	0.0
Upper	91	52.0	89	51.7	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	175	100.0	172	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-8

2022 Cheyenne MSA 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	4,533	17.3
Moderate	6	22.2	4,199	16.1	425	10.1	4,680	17.9
Middle	14	51.9	13,888	53.2	786	5.7	6,531	25.0
Upper	6	22.2	8,041	30.8	296	3.7	10,384	39.7
Unknown	1	3.7	0	0.0	0	0.0	0	0.0
Total AA	27	100.0	26,128	100.0	1,507	5.8	26,128	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,135	3,289	11.3	40.4	4,023	49.5	823	10.1
Middle	24,200	16,641	57.1	68.8	5,423	22.4	2,136	8.8
Upper	11,506	9,239	31.7	80.3	1,587	13.8	680	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	43,841	29,169	100.0	66.5	11,033	25.2	3,639	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2,907	47.7	2,607	46.9	200	56.2	100	57.5
Middle	2,082	34.2	1,932	34.7	101	28.4	49	28.2
Upper	1,083	17.8	1,006	18.1	53	14.9	24	13.8
Unknown	18	0.3	15	0.3	2	0.6	1	0.6
Total AA	6,090	100.0	5,560	100.0	356	100.0	174	100.0
Percentage of Total Businesses:				91.3		5.8		2.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	4.1	7	4.2	0	0.0	0	0.0
Middle	72	42.4	71	42.5	1	33.3	0	0.0
Upper	91	53.5	89	53.3	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	170	100.0	167	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Northern Wyoming

Table D-9

2023 Northern Wyoming 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	7,639	20.2
Moderate	8	22.9	8,054	21.3	723	9.0	7,267	19.2
Middle	25	71.4	26,524	70.0	1,724	6.5	8,932	23.6
Upper	2	5.7	3,310	8.7	117	3.5	14,050	37.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	35	100.0	37,888	100.0	2,564	6.8	37,888	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,039	8,564	20.7	56.9	4,348	28.9	2,127	14.1
Middle	46,879	29,394	70.9	62.7	10,796	23.0	6,689	14.3
Upper	4,658	3,495	8.4	75.0	771	16.6	392	8.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	66,576	41,453	100.0	62.3	15,915	23.9	9,208	13.8
	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	2,137	14.4	1,976	14.3	126	18.9	35	8.4
Middle	12,327	82.9	11,429	82.9	524	78.8	374	90.1
Upper	401	2.7	380	2.8	15	2.3	6	1.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	14,865	100.0	13,785	100.0	665	100.0	415	100.0
Percentage of Total Businesses:				92.7		4.5		2.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	108	17.6	105	17.4	2	25.0	1	100.0
Middle	493	80.3	487	80.5	6	75.0	0	0.0
Upper	13	2.1	13	2.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	614	100.0	605	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.5		1.3		0.2
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-10

2022 Northern Wyoming 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	7,639	20.2
Moderate	8	22.9	8,054	21.3	723	9.0	7,267	19.2
Middle	25	71.4	26,524	70.0	1,724	6.5	8,932	23.6
Upper	2	5.7	3,310	8.7	117	3.5	14,050	37.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	35	100.0	37,888	100.0	2,564	6.8	37,888	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	15,039	8,564	20.7	56.9	4,348	28.9	2,127	14.1
Middle	46,879	29,394	70.9	62.7	10,796	23.0	6,689	14.3
Upper	4,658	3,495	8.4	75.0	771	16.6	392	8.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	66,576	41,453	100.0	62.3	15,915	23.9	9,208	13.8
	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	2,114	16.7	1,954	16.7	124	18.9	36	11.5
Middle	10,154	80.3	9,367	80.2	517	78.8	270	86.5
Upper	384	3.0	363	3.1	15	2.3	6	1.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	12,652	100.0	11,684	100.0	656	100.0	312	100.0
Percentage of Total Businesses:				92.3		5.2		2.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	104	17.7	101	17.5	2	25.0	1	100.0
Middle	471	80.2	465	80.4	6	75.0	0	0.0
Upper	12	2.0	12	2.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	587	100.0	578	100.0	8	100.0	1	100.0
Percentage of Total Farms:				98.5		1.4		0.2
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Fort Collins MSA

Table E-1

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Fort Collins MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%%	%%	#	##	##	\$(000)	%%	%%	
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	0.3
Moderate	10	34.5	13.1	2,624	51.5	11.5	1	5.3	13.4	295	7.1	11.8	14.8
Middle	10	34.5	61.7	1,078	21.2	60.1	16	84.2	59.9	3,661	88.1	58.1	64.3
Upper	9	31.0	24.7	1,392	27.3	28.0	2	10.5	26.5	200	4.8	29.9	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	5,094	100.0	100.0	19	100.0	100.0	4,156	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.1	0	0.0	0.2	0.3
Moderate	0	0.0	13.1	0	0.0	11.2	0	0.0	13.1	0	0.0	10.8	14.8
Middle	3	100.0	63.7	916	100.0	61.6	1	100.0	61.8	430	100.0	60.4	64.3
Upper	0	0.0	22.7	0	0.0	26.8	0	0.0	24.9	0	0.0	28.5	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	916	100.0	100.0	1	100.0	100.0	430	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.4	0.3
Moderate	0	0.0	11.6	0	0.0	11.2	0	0.0	12.6	0	0.0	10.4	14.8
Middle	1	100.0	63.2	20	100.0	60.4	1	100.0	62.6	185	100.0	60.9	64.3
Upper	0	0.0	25.0	0	0.0	28.3	0	0.0	24.5	0	0.0	28.2	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	20	100.0	100.0	1	100.0	100.0	185	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	3.1	0	0.0	1.3	0	0.0	0.0	0	0.0	0.0	
Moderate	2	100.0	31.3	3,179	100.0	15.0	0	0.0	26.3	0	0.0	20.7	19.4
Middle	0	0.0	53.1	0	0.0	44.7	2	100.0	63.2	26,000	100.0	54.0	67.4
Upper	0	0.0	12.5	0	0.0	39.0	0	0.0	10.5	0	0.0	25.3	6.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	3,179	100.0	100.0	2	100.0	100.0	26,000	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	0.3
Moderate	12	31.6	12.8	5,803	58.2	11.5	1	4.3	13.1	295	1.0	12.2	14.8
Middle	17	44.7	62.4	2,775	27.8	59.6	20	87.0	60.9	30,276	98.4	58.3	64.3
Upper	9	23.7	24.4	1,392	14.0	28.4	2	8.7	25.7	200	0.6	29.3	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	9,970	100.0	100.0	23	100.0	100.0	30,771	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-2

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Fort Collins MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.4	0	0.0	0.1	0	0.0	0	0.0	0.4
Moderate	12	23.5	15.2	631	23.2	15.7	3	8.6	478	23.3	16.6
Middle	28	54.9	62.1	1,975	72.5	65.3	27	77.1	1,421	69.4	65.6
Upper	11	21.6	21.5	117	4.3	18.6	5	14.3	149	7.3	17.3
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	51	100.0	100.0	2,723	100.0	100.0	35	100.0	2,048	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-3

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography											
Assessment Area: Fort Collins MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.4
Moderate	0	0.0	6.2	0	0.0	2.1	0	0.0	0	0.0	8.6
Middle	0	0.0	66.7	0	0.0	76.7	0	0.0	0	0.0	63.9
Upper	0	0.0	25.3	0	0.0	19.8	1	100.0	1	100.0	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.2
Tract-Unk	0	0.0	1.9	0	0.0	1.4	0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	1	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-4

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Fort Collins MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	10	34.5	3.9	503	9.9	1.9	2	10.5	3.7	86	2.1	1.7	19.2
Moderate	8	27.6	15.0	570	11.2	10.7	8	42.1	14.4	666	16.0	10.3	18.3
Middle	2	6.9	23.2	125	2.5	21.0	3	15.8	23.5	629	15.1	21.4	23.6
Upper	3	10.3	40.0	689	13.5	48.4	2	10.5	38.7	1,300	31.3	47.1	38.9
Unknown	6	20.7	17.9	3,207	63.0	18.0	4	21.1	19.7	1,475	35.5	19.5	0.0
Total	29	100.0	100.0	5,094	100.0	100.0	19	100.0	100.0	4,156	100.0	100.0	100.0
Refinance Loans													
Low	1	33.3	13.1	28	3.1	8.4	0	0.0	10.3	0	0.0	6.6	19.2
Moderate	0	0.0	20.9	0	0.0	17.3	0	0.0	19.5	0	0.0	13.6	18.3
Middle	0	0.0	21.5	0	0.0	20.9	0	0.0	23.7	0	0.0	21.5	23.6
Upper	0	0.0	30.4	0	0.0	38.4	0	0.0	33.1	0	0.0	41.5	38.9
Unknown	2	66.7	14.1	888	96.9	15.0	1	100.0	13.3	430	100.0	16.7	0.0
Total	3	100.0	100.0	916	100.0	100.0	1	100.0	100.0	430	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.4	0	0.0	5.2	0	0.0	7.7	0	0.0	3.8	19.2
Moderate	1	100.0	15.7	20	100.0	11.7	0	0.0	15.8	0	0.0	10.8	18.3
Middle	0	0.0	25.3	0	0.0	20.7	0	0.0	26.3	0	0.0	22.5	23.6
Upper	0	0.0	49.4	0	0.0	59.7	1	100.0	45.8	185	100.0	57.3	38.9
Unknown	0	0.0	2.2	0	0.0	2.7	0	0.0	4.3	0	0.0	5.5	0.0
Total	1	100.0	100.0	20	100.0	100.0	1	100.0	100.0	185	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	12	33.3	7.2	552	8.1	3.9	2	9.5	5.8	86	1.8	2.6	19.2
Moderate	10	27.8	17.1	835	12.3	12.6	8	38.1	15.9	666	14.0	10.8	18.3
Middle	2	5.6	23.4	125	1.8	20.9	3	14.3	24.3	629	13.2	21.5	23.6
Upper	4	11.1	38.7	1,184	17.4	46.5	3	14.3	38.6	1,485	31.1	47.0	38.9
Unknown	8	22.2	13.7	4,095	60.3	16.2	5	23.8	15.3	1,905	39.9	18.1	0.0
Total	36	100.0	100.0	6,791	100.0	100.0	21	100.0	100.0	4,771	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-5

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Fort Collins MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	№%	№%	\$(000)	№%	№%	#	№%	\$(000)	№%	
By Revenue											
\$1 Million or Less	37	72.5	56.3	477	17.5	37.2	24	68.6	1,284	62.7	94.1
Over \$1 Million	14	27.5		2,246	82.5		11	31.4	764	37.3	4.9
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.0
Total	51	100.0		2,723	100.0		35	100.0	2,048	100.0	100.0
By Loan Size											
\$100,000 or Less	46	90.2	94.3	301	11.1	38.3	30	85.7	322	15.7	
\$100,001 - \$250,000	2	3.9	2.7	459	16.9	13.3	1	2.9	200	9.8	
\$250,001 - \$1 Million	3	5.9	3.0	1,963	72.1	48.3	4	11.4	1,526	74.5	
Total	51	100.0	100.0	2,723	100.0	100.0	35	100.0	2,048	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	36	97.3		202	42.3		21	87.5	178	13.9	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$1 Million	1	2.7		275	57.7		3	12.5	1,106	86.1	
Total	37	100.0		477	100.0		24	100.0	1,284	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-6

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Fort Collins MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	\$%	#	#%	\$(000)	%	
By Revenue											
\$1 Million or Less	0	0.0	69.1	0	0.0	63.5	1	100.0	1	100.0	97.4
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	2.4
Revenue Unknown	0	0.0		0	0.0		0	0.0	0.2		
Total	0	0.0		0	0.0		1	100.0	1	100.0	100.0
By Loan Size											
\$100,000 or Less	0	0.0	91.4	0	0.0	39.2	1	100.0	1	100.0	
\$100,001 - \$250,000	0	0.0	4.3	0	0.0	19.2	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	4.3	0	0.0	41.6	0	0.0	0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	1	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	0	0.0		0	0.0		1	100.0	1	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0			
Total	0	0.0		0	0.0		1	100.0	1	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-7

2023 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.2	653	0.8	116	17.8	16,127	19.2
Moderate	16	18.6	13,425	16.0	1,046	7.8	15,377	18.3
Middle	52	60.5	54,206	64.6	2,318	4.3	19,784	23.6
Upper	16	18.6	15,637	18.6	436	2.8	32,633	38.9
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	86	100.0	83,921	100.0	3,916	4.7	83,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,434	309	0.3	12.7	2,046	84.1	79	3.2
Moderate	25,291	13,129	14.8	51.9	10,580	41.8	1,582	6.3
Middle	94,518	57,198	64.3	60.5	29,482	31.2	7,838	8.3
Upper	22,207	18,238	20.5	82.1	3,101	14.0	868	3.9
Unknown	133	85	0.1	63.9	17	12.8	31	23.3
Total AA	144,583	88,959	100.0	61.5	45,226	31.3	10,398	7.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	101	0.4	99	0.5	2	0.2	0	0.0
Moderate	3,736	16.6	3,496	16.5	213	19.3	27	12.6
Middle	14,758	65.6	13,903	65.7	724	65.7	131	61.2
Upper	3,886	17.3	3,667	17.3	163	14.8	56	26.2
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	22,483	100.0	21,167	100.0	1,102	100.0	214	100.0
Percentage of Total Businesses:				94.1		4.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	40	8.6	39	8.6	1	9.1	0	0.0
Middle	298	63.9	293	64.5	4	36.4	1	100.0
Upper	125	26.8	119	26.2	6	54.5	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	466	100.0	454	100.0	11	100.0	1	100.0
Percentage of Total Farms:				97.4		2.4		0.2
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-8

2022 Fort Collins MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.2	653	0.8	116	17.8	16,127	19.2
Moderate	16	18.6	13,425	16.0	1,046	7.8	15,377	18.3
Middle	52	60.5	54,206	64.6	2,318	4.3	19,784	23.6
Upper	16	18.6	15,637	18.6	436	2.8	32,633	38.9
Unknown	1	1.2	0	0.0	0	0.0	0	0.0
Total AA	86	100.0	83,921	100.0	3,916	4.7	83,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,434	309	0.3	12.7	2,046	84.1	79	3.2
Moderate	25,291	13,129	14.8	51.9	10,580	41.8	1,582	6.3
Middle	94,518	57,198	64.3	60.5	29,482	31.2	7,838	8.3
Upper	22,207	18,238	20.5	82.1	3,101	14.0	868	3.9
Unknown	133	85	0.1	63.9	17	12.8	31	23.3
Total AA	144,583	88,959	100.0	61.5	45,226	31.3	10,398	7.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	100	0.4	98	0.5	2	0.2	0	0.0
Moderate	3,737	16.5	3,486	16.4	221	19.9	30	13.3
Middle	14,823	65.6	13,964	65.7	720	64.7	139	61.8
Upper	3,938	17.4	3,712	17.5	170	15.3	56	24.9
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	22,600	100.0	21,262	100.0	1,113	100.0	225	100.0
Percentage of Total Businesses:				94.1		4.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	0.4	2	0.4	0	0.0	0	0.0
Moderate	43	9.4	42	9.4	1	10.0	0	0.0
Middle	284	62.1	279	62.6	4	40.0	1	100.0
Upper	127	27.8	122	27.4	5	50.0	0	0.0
Unknown	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	457	100.0	446	100.0	10	100.0	1	100.0
Percentage of Total Farms:				97.6		2.2		0.2
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Grand Junction MSA

Table E-9

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Grand Junction MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0	0.0	0.4	0.2
Moderate	14	51.9	32.1	1,651	39.8	26.5	10	45.5	33.1	1,091	33.4	27.2	25.3
Middle	12	44.4	47.5	2,253	54.4	46.7	10	45.5	44.4	1,562	47.8	44.1	46.6
Upper	1	3.7	20.0	240	5.8	26.5	2	9.1	22.0	615	18.8	28.3	28.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	4,144	100.0	100.0	22	100.0	100.0	3,268	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.2
Moderate	3	23.1	28.9	321	17.8	24.2	1	25.0	26.8	39	16.5	21.3	25.3
Middle	7	53.8	48.8	899	49.9	48.9	3	75.0	47.6	198	83.5	48.4	46.6
Upper	3	23.1	21.9	583	32.3	26.6	0	0.0	25.5	0	0.0	30.1	28.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,803	100.0	100.0	4	100.0	100.0	237	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Moderate	1	12.5	22.7	60	13.1	18.5	1	10.0	21.8	18	3.0	17.5	25.3
Middle	4	50.0	48.1	112	24.5	47.4	3	30.0	44.1	155	25.9	40.7	46.6
Upper	3	37.5	29.2	285	62.4	34.0	6	60.0	34.1	426	71.1	41.7	28.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	457	100.0	100.0	10	100.0	100.0	599	100.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	7.4	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	9.1
Moderate	1	25.0	33.3	39,000	60.0	53.8	1	100.0	57.1	5,000	100.0	27.9	30.3
Middle	3	75.0	59.3	26,026	40.0	44.1	0	0.0	35.7	0	0.0	16.0	45.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	56.1	15.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	65,026	100.0	100.0	1	100.0	100.0	5,000	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	0.2
Moderate	23	39.7	29.9	41,126	57.2	27.1	14	31.8	30.6	6,166	64.4	25.9	25.3
Middle	28	48.3	48.4	29,620	41.2	47.2	19	43.2	45.1	2,064	21.6	43.6	46.6
Upper	7	12.1	21.4	1,108	1.5	25.3	11	25.0	23.9	1,346	14.1	30.2	28.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	71,854	100.0	100.0	44	100.0	100.0	9,576	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-10

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Grand Junction MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	2	2.1	1.5	150	2.9	2.7	0	0.0	0	0.0	2.6
Moderate	31	32.0	23.3	882	17.3	24.2	25	29.1	1,258	23.9	24.5
Middle	45	46.4	51.3	3,976	77.8	54.8	37	43.0	3,211	60.9	49.7
Upper	19	19.6	23.2	105	2.1	18.0	24	27.9	805	15.3	23.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.8	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	97	100.0	100.0	5,113	100.0	100.0	86	100.0	5,274	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-11

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography											
Assessment Area: Grand Junction MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	3.1	0	0.0	0.2	0	0.0	0	0.0	6.3
Middle	0	0.0	75.2	0	0.0	76.8	5	100.0	153	100.0	62.4
Upper	0	0.0	21.1	0	0.0	22.8	0	0.0	0	0.0	31.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	153	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-12

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Grand Junction MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	4	14.8	5.3	397	9.6	2.5	4	18.2	4.2	203	6.2	2.1	19.4
Moderate	9	33.3	21.0	982	23.7	15.3	4	18.2	18.7	474	14.5	13.2	18.8
Middle	4	14.8	26.2	519	12.5	23.8	5	22.7	26.9	984	30.1	23.7	22.3
Upper	8	29.6	34.4	1,390	33.5	44.1	4	18.2	33.0	770	23.6	42.1	39.5
Unknown	2	7.4	13.1	856	20.7	14.3	5	22.7	17.2	837	25.6	18.9	0.0
Total	27	100.0	100.0	4,144	100.0	100.0	22	100.0	100.0	3,268	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	13.8	0	0.0	9.1	0	0.0	12.0	0	0.0	7.6	19.4
Moderate	8	61.5	25.1	970	53.8	21.1	2	50.0	22.5	116	48.9	17.9	18.8
Middle	3	23.1	22.3	588	32.6	22.1	2	50.0	24.2	121	51.1	22.9	22.3
Upper	1	7.7	24.2	100	5.5	32.0	0	0.0	26.4	0	0.0	32.5	39.5
Unknown	1	7.7	14.5	145	8.0	15.7	0	0.0	14.8	0	0.0	19.1	0.0
Total	13	100.0	100.0	1,803	100.0	100.0	4	100.0	100.0	237	100.0	100.0	100.0
Home Improvement Loans													
Low	3	37.5	6.4	77	16.8	4.8	0	0.0	8.4	0	0.0	5.2	19.4
Moderate	0	0.0	17.6	0	0.0	11.7	5	50.0	16.8	229	38.2	10.3	18.8
Middle	1	12.5	24.7	200	43.8	19.8	3	30.0	22.6	280	46.7	20.0	22.3
Upper	3	37.5	47.0	165	36.1	59.3	2	20.0	46.2	90	15.0	58.0	39.5
Unknown	1	12.5	4.3	15	3.3	4.4	0	0.0	6.0	0	0.0	6.4	0.0
Total	8	100.0	100.0	457	100.0	100.0	10	100.0	100.0	599	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	14.8	8.6	495	7.2	4.8	7	16.3	6.6	341	7.5	3.3	19.4
Moderate	18	33.3	21.6	1,977	29.0	16.8	12	27.9	20.0	884	19.3	14.1	18.8
Middle	11	20.4	25.1	1,385	20.3	23.1	11	25.6	26.2	1,429	31.2	23.5	22.3
Upper	13	24.1	32.2	1,955	28.6	41.0	8	18.6	32.9	1,085	23.7	41.2	39.5
Unknown	4	7.4	12.5	1,016	14.9	14.3	5	11.6	14.3	837	18.3	17.9	0.0
Total	54	100.0	100.0	6,828	100.0	100.0	43	100.0	100.0	4,576	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-13

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Grand Junction MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
By Revenue											
\$1 Million or Less	69	71.1	57.3	1,039	20.3	35.3	66	76.7	775	14.7	93.0
Over \$1 Million	28	28.9		4,074	79.7		20	23.3	4,499	85.3	6.0
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.0
Total	97	100.0		5,113	100.0		86	100.0	5,274	100.0	100.0
By Loan Size											
\$100,000 or Less	86	88.7	93.6	883	17.3	36.8	71	82.6	457	8.7	
\$100,001 - \$250,000	6	6.2	3.3	1,058	20.7	16.4	6	7.0	1,169	22.2	
\$250,001 - \$1 Million	5	5.2	3.1	3,172	62.0	46.8	9	10.5	3,648	69.2	
Total	97	100.0	100.0	5,113	100.0	100.0	86	100.0	5,274	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	66	95.7		330	31.8		63	95.5	287	37.0	
\$100,001 - \$250,000	2	2.9		387	37.2		3	4.5	488	63.0	
\$250,001 - \$1 Million	1	1.4		322	31.0		0	0.0	0	0.0	
Total	69	100.0		1,039	100.0		66	100.0	775	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-14

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Grand Junction MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	0	0.0	80.1	0	0.0	84.9	5	100.0	153	100.0	98.2
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	1.8
Revenue Unknown	0	0.0		0	0.0		0	0.0	0.0		
Total	0	0.0		0	0.0		5	100.0	153	100.0	100.0
By Loan Size											
\$100,000 or Less	0	0.0	81.4	0	0.0	32.5	5	100.0	153	100.0	
\$100,001 - \$250,000	0	0.0	11.8	0	0.0	30.7	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	6.8	0	0.0	36.8	0	0.0	0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	153	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	0	0.0		0	0.0		5	100.0	153	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0			
Total	0	0.0		0	0.0		5	100.0	153	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-15

2023 Grand Junction MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.0	162	0.4	23	14.2	7,268	19.4
Moderate	10	30.3	10,749	28.6	1,681	15.6	7,067	18.8
Middle	14	42.4	17,083	45.5	1,294	7.6	8,360	22.3
Upper	8	24.2	9,534	25.4	199	2.1	14,833	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	33	100.0	37,528	100.0	3,197	8.5	37,528	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	784	82	0.2	10.5	603	76.9	99	12.6
Moderate	19,815	10,423	25.3	52.6	8,313	42.0	1,079	5.4
Middle	28,789	19,225	46.6	66.8	7,338	25.5	2,226	7.7
Upper	14,856	11,540	28.0	77.7	2,226	15.0	1,090	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	64,244	41,270	100.0	64.2	18,480	28.8	4,494	7.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	207	2.6	193	2.6	13	2.7	1	1.3
Moderate	1,981	24.5	1,865	24.8	100	20.4	16	20.5
Middle	4,030	49.7	3,686	48.9	303	62.0	41	52.6
Upper	1,884	23.3	1,791	23.8	73	14.9	20	25.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,102	100.0	7,535	100.0	489	100.0	78	100.0
Percentage of Total Businesses:				93.0		6.0		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	17	6.3	17	6.4	0	0.0	0	0.0
Middle	169	62.4	167	62.8	2	40.0	0	0.0
Upper	85	31.4	82	30.8	3	60.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	271	100.0	266	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table E-16

2022 Grand Junction MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.0	162	0.4	23	14.2	7,268	19.4
Moderate	10	30.3	10,749	28.6	1,681	15.6	7,067	18.8
Middle	14	42.4	17,083	45.5	1,294	7.6	8,360	22.3
Upper	8	24.2	9,534	25.4	199	2.1	14,833	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	33	100.0	37,528	100.0	3,197	8.5	37,528	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	784	82	0.2	10.5	603	76.9	99	12.6
Moderate	19,815	10,423	25.3	52.6	8,313	42.0	1,079	5.4
Middle	28,789	19,225	46.6	66.8	7,338	25.5	2,226	7.7
Upper	14,856	11,540	28.0	77.7	2,226	15.0	1,090	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	64,244	41,270	100.0	64.2	18,480	28.8	4,494	7.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	209	2.6	195	2.6	13	2.6	1	1.3
Moderate	2,030	24.9	1,907	25.2	103	20.9	20	25.0
Middle	4,002	49.1	3,662	48.3	302	61.3	38	47.5
Upper	1,907	23.4	1,811	23.9	75	15.2	21	26.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,148	100.0	7,575	100.0	493	100.0	80	100.0
Percentage of Total Businesses:				93.0		6.1		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	17	6.2	17	6.3	0	0.0	0	0.0
Middle	169	61.7	167	62.1	2	40.0	0	0.0
Upper	88	32.1	85	31.6	3	60.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	274	100.0	269	100.0	5	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Boulder MSA

Table E-17

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Boulder MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	2	10.0	1.3	189	0.4	2.6	1.7
Moderate	3	21.4	0.0	204	2.2	0.0	9	45.0	13.4	899	1.8	14.5	14.2
Middle	8	57.1	0.0	7,717	82.9	0.0	7	35.0	48.3	46,511	92.5	42.6	44.2
Upper	3	21.4	0.0	1,385	14.9	0.0	2	10.0	35.8	2,690	5.3	39.2	38.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	1.2	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	0.0	9,306	100.0	0.0	20	100.0	100.0	50,289	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-18

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Boulder MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	1	2.2	0.0	1	0.0	0.0	1	2.7	1	0.0	2.0
Moderate	12	26.7	0.0	1,761	25.5	0.0	11	29.7	1,608	22.1	20.3
Middle	21	46.7	0.0	2,914	42.2	0.0	17	45.9	4,238	58.1	38.8
Upper	9	20.0	0.0	479	6.9	0.0	7	18.9	540	7.4	37.2
Unknown	2	4.4	0.0	1,752	25.4	0.0	1	2.7	905	12.4	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	45	100.0	0.0	6,907	100.0	0.0	37	100.0	7,292	100.0	100.0
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											
No Small Farm lending occurred in 2022 or 2023 in Boulder MSA.											

Table E-19

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Boulder MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Total Home Mortgage Loans													
Low	2	14.3	0.0	77	0.8	0.0	5	29.4	7.7	356	7.2	2.9	20.5
Moderate	4	28.6	0.0	1,433	15.4	0.0	4	23.5	15.6	514	10.4	8.9	17.8
Middle	3	21.4	0.0	899	9.7	0.0	4	23.5	20.0	801	16.2	15.1	21.3
Upper	4	28.6	0.0	2,850	30.6	0.0	4	23.5	44.0	3,278	66.2	56.0	40.5
Unknown	1	7.1	0.0	4,047	43.5	0.0	0	0.0	12.7	0	0.0	17.1	0.0
Total	14	100.0	0.0	9,306	100.0	0.0	17	100.0	100.0	4,949	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-20

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses												
Assessment Area: Boulder MSA												
	Bank And Aggregate Loans By Year										Total Businesses %	
	2022						2023*					
	Bank		Agg	Bank		Agg	Bank					
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%		
By Revenue												
\$1 Million or Less	21	46.7	0.0	1,886	27.3	0.0	23	62.2	2,534	34.8	93.1	
Over \$1 Million	24	53.3		5,021	72.7		14	37.8	4,758	65.2	5.8	
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.1	
Total	45	100.0		6,907	100.0		37	100.0	7,292	100.0	100.0	
By Loan Size												
\$100,000 or Less	31	68.9	0.0	352	5.1	0.0	21	56.8	304	4.2		
\$100,001 - \$250,000	6	13.3	0.0	1,245	18.0	0.0	6	16.2	1,135	15.6		
\$250,001 - \$1 Million	8	17.8	0.0	5,310	76.9	0.0	10	27.0	5,853	80.3		
Total	45	100.0	0.0	6,907	100.0	0.0	37	100.0	7,292	100.0		
By Loan Size and Revenues \$1 Million or Less												
\$100,000 or Less	18	85.7		128	6.8		18	78.3	106	4.2		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0		
\$250,001 - \$1 Million	3	14.3		1,758	93.2		5	21.7	2,428	95.8		
Total	21	100.0		1,886	100.0		23	100.0	2,534	100.0		
Source: 2023 FFIEC Census Data												
2023 Dun & Bradstreet Data												
2016-2020 U.S. Census Bureau: American Community Survey												
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.												
No Small Farm lending occurred in 2022 or 2023 in Boulder MSA.												

Table E-21

2023 Boulder MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	5.1	1,452	2.0	98	6.7	14,995	20.5
Moderate	13	16.7	11,513	15.7	804	7.0	13,023	17.8
Middle	32	41.0	32,959	45.0	1,361	4.1	15,578	21.3
Upper	26	33.3	26,585	36.3	673	2.5	29,648	40.5
Unknown	3	3.8	735	1.0	143	19.5	0	0.0
Total AA	78	100.0	73,244	100.0	3,079	4.2	73,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,335	1,370	1.7	31.6	2,702	62.3	263	6.1
Moderate	22,404	11,509	14.2	51.4	9,815	43.8	1,080	4.8
Middle	60,609	35,820	44.2	59.1	20,532	33.9	4,257	7.0
Upper	42,756	31,308	38.6	73.2	9,743	22.8	1,705	4.0
Unknown	5,305	1,054	1.3	19.9	3,512	66.2	739	13.9
Total AA	135,409	81,061	100.0	59.9	46,304	34.2	8,044	5.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	520	2.0	475	2.0	39	2.6	6	2.2
Moderate	5,200	20.3	4,702	19.7	446	30.0	52	18.9
Middle	9,956	38.8	9,321	39.1	536	36.0	99	36.0
Upper	9,541	37.2	8,978	37.6	449	30.2	114	41.5
Unknown	413	1.6	391	1.6	18	1.2	4	1.5
Total AA	25,630	100.0	23,867	100.0	1,488	100.0	275	100.0
Percentage of Total Businesses:				93.1		5.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	1.0	3	0.8	1	16.7	0	0.0
Moderate	63	16.1	62	16.1	1	16.7	0	0.0
Middle	175	44.8	171	44.5	3	50.0	1	100.0
Upper	146	37.3	145	37.8	1	16.7	0	0.0
Unknown	3	0.8	3	0.8	0	0.0	0	0.0
Total AA	391	100.0	384	100.0	6	100.0	1	100.0
Percentage of Total Farms:				98.2		1.5		0.3
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-22

2022 Boulder MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	5.1	1,452	2.0	98	6.7	14,995	20.5
Moderate	13	16.7	11,513	15.7	804	7.0	13,023	17.8
Middle	32	41.0	32,959	45.0	1,361	4.1	15,578	21.3
Upper	26	33.3	26,585	36.3	673	2.5	29,648	40.5
Unknown	3	3.8	735	1.0	143	19.5	0	0.0
Total AA	78	100.0	73,244	100.0	3,079	4.2	73,244	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,335	1,370	1.7	31.6	2,702	62.3	263	6.1
Moderate	22,404	11,509	14.2	51.4	9,815	43.8	1,080	4.8
Middle	60,609	35,820	44.2	59.1	20,532	33.9	4,257	7.0
Upper	42,756	31,308	38.6	73.2	9,743	22.8	1,705	4.0
Unknown	5,305	1,054	1.3	19.9	3,512	66.2	739	13.9
Total AA	135,409	81,061	100.0	59.9	46,304	34.2	8,044	5.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	548	2.1	499	2.1	43	2.8	6	2.1
Moderate	5,234	20.1	4,737	19.5	444	29.4	53	18.5
Middle	10,202	39.2	9,539	39.3	559	37.0	104	36.4
Upper	9,588	36.8	9,026	37.2	443	29.3	119	41.6
Unknown	474	1.8	447	1.8	23	1.5	4	1.4
Total AA	26,046	100.0	24,248	100.0	1,512	100.0	286	100.0
Percentage of Total Businesses:				93.1		5.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	1.0	3	0.8	1	16.7	0	0.0
Moderate	63	15.6	62	15.7	1	16.7	0	0.0
Middle	182	45.2	178	44.9	3	50.0	1	100.0
Upper	151	37.5	150	37.9	1	16.7	0	0.0
Unknown	3	0.7	3	0.8	0	0.0	0	0.0
Total AA	403	100.0	396	100.0	6	100.0	1	100.0
Percentage of Total Farms:				98.3		1.5		0.2
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

San Miguel County

Table E-23

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: San Miguel County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	66.7	36.9	891	45.6	15.3	3	37.5	32.8	577	5.0	15.1	69.3
Upper	2	33.3	63.1	1,064	54.4	84.7	5	62.5	67.2	10,936	95.0	84.9	30.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	1,955	100.0	100.0	8	100.0	100.0	11,513	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-24

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: San Miguel County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	4	26.7	35.9	24	1.2	28.2	0	0.0	0	0.0	35.2
Upper	11	73.3	53.1	2,043	98.8	68.8	5	100.0	575	100.0	64.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	10.9	0	0.0	3.0	0	0.0	0	0.0	0.0
Total	15	100.0	100.0	2,067	100.0	100.0	5	100.0	575	100.0	100.0
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											
No Small Farm lending occurred in 2022 or 2023 in San Miguel County.											

Table E-25

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: San Miguel County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Total Home Mortgage Loans													
Low	0	0.0	2.4	0	0.0	1.2	1	12.5	1.5	105	0.9	0.6	15.0
Moderate	0	0.0	4.7	0	0.0	0.8	1	12.5	5.4	22	0.2	0.9	13.7
Middle	1	16.7	7.1	275	14.1	1.3	1	12.5	6.9	123	1.1	1.1	19.2
Upper	4	66.7	64.7	1,166	59.6	66.5	2	25.0	51.0	1,088	9.5	45.2	52.1
Unknown	1	16.7	21.1	514	26.3	30.1	3	37.5	35.3	10,175	88.4	52.2	0.0
Total	6	100.0	100.0	1,955	100.0	100.0	8	100.0	100.0	11,513	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-26

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: San Miguel County											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	14	93.3	51.3	1,817	87.9	51.7	4	80.0	275	47.8	90.3
Over \$1 Million	1	6.7		250	12.1		1	20.0	300	52.2	8.1
Revenue Unknown	0	0.0		0	0.0		0	0.0	1.6		
Total	15	100.0		2,067	100.0		5	100.0	575	100.0	100.0
By Loan Size											
\$100,000 or Less	10	66.7	95.3	30	1.5	46.3	3	60.0	16	2.8	
\$100,001 - \$250,000	2	13.3	3.0	453	21.9	18.0	0	0.0	0	0.0	
\$250,001 - \$1 Million	3	20.0	1.7	1,584	76.6	35.7	2	40.0	559	97.2	
Total	15	100.0	100.0	2,067	100.0	100.0	5	100.0	575	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	10	71.4		30	1.7		3	75.0	16	5.8	
\$100,001 - \$250,000	1	7.1		203	11.2		0	0.0	0	0.0	
\$250,001 - \$1 Million	3	21.4		1,584	87.2		1	25.0	259	94.2	
Total	14	100.0		1,817	100.0		4	100.0	275	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											
No Small Farm Lending occurred in the San Miguel County AA for 2022 or 2023.											

Table E-27

2023 San Miguel County 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	299	15.0
Moderate	0	0.0	0	0.0	0	0.0	273	13.7
Middle	2	50.0	1,209	60.7	28	2.3	383	19.2
Upper	2	50.0	783	39.3	51	6.5	1,037	52.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	1,992	100.0	79	4.0	1,992	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,512	1,498	69.3	59.6	359	14.3	655	26.1
Upper	4,244	663	30.7	15.6	1,084	25.5	2,497	58.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,756	2,161	100.0	32.0	1,443	21.4	3,152	46.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	257	35.2	241	36.6	14	23.7	2	16.7
Upper	473	64.8	418	63.4	45	76.3	10	83.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	730	100.0	659	100.0	59	100.0	12	100.0
Percentage of Total Businesses:				90.3		8.1		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	8	88.9	8	88.9	0	0.0	0	0.0
Upper	1	11.1	1	11.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	9	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table E-28

2022 San Miguel County 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	299	15.0
Moderate	0	0.0	0	0.0	0	0.0	273	13.7
Middle	2	50.0	1,209	60.7	28	2.3	383	19.2
Upper	2	50.0	783	39.3	51	6.5	1,037	52.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	1,992	100.0	79	4.0	1,992	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,512	1,498	69.3	59.6	359	14.3	655	26.1
Upper	4,244	663	30.7	15.6	1,084	25.5	2,497	58.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,756	2,161	100.0	32.0	1,443	21.4	3,152	46.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	259	35.5	243	37.0	14	23.3	2	16.7
Upper	470	64.5	414	63.0	46	76.7	10	83.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	729	100.0	657	100.0	60	100.0	12	100.0
Percentage of Total Businesses:				90.1		8.2		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	8	88.9	8	88.9	0	0.0	0	0.0
Upper	1	11.1	1	11.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	9	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Casper MSA

Table E-29

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Casper MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	16.0	20.5	506	17.3	17.0	5	27.8	23.2	520	31.7	18.4	22.4
Middle	9	36.0	51.8	1,111	38.0	48.8	7	38.9	50.4	759	46.2	50.1	49.0
Upper	12	48.0	27.8	1,309	44.7	34.2	6	33.3	26.4	363	22.1	31.5	28.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	2,926	100.0	100.0	18	100.0	100.0	1,642	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-30

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Casper MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	8	22.2	30.0	1,477	54.0	32.2	8	36.4	341	16.5	32.4
Middle	23	63.9	30.6	1,054	38.6	37.1	10	45.5	1,332	64.5	37.8
Upper	5	13.9	38.4	203	7.4	30.4	4	18.2	391	18.9	29.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	36	100.0	100.0	2,734	100.0	100.0	22	100.0	2,064	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-31

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography											
Assessment Area: Casper MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	18.0
Middle	0	0.0	15.2	0	0.0	6.1	1	100.0	100	100.0	33.7
Upper	2	100.0	84.8	144	100.0	93.9	0	0.0	0	0.0	48.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	2	100.0	100.0	144	100.0	100.0	1	100.0	100	100.0	100.0
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-32

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Casper MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	%	\$(000)	%	%	#	#%	%	\$(000)	%	%	
Total Home Mortgage Loans													
Low	6	24.0	8.5	433	14.8	4.7	6	33.3	7.5	280	17.1	3.7	19.2
Moderate	8	32.0	21.0	621	21.2	14.6	6	33.3	24.5	423	25.8	17.4	19.1
Middle	8	32.0	20.9	1,535	52.5	19.3	3	16.7	24.1	324	19.7	22.4	22.0
Upper	2	8.0	25.1	208	7.1	32.2	2	11.1	26.1	225	13.7	35.5	39.7
Unknown	1	4.0	24.5	129	4.4	29.2	1	5.6	17.7	390	23.8	21.0	0.0
Total	25	100.0	100.0	2,926	100.0	100.0	18	100.0	100.0	1,642	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-33

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Casper MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	25	69.4	50.4	979	35.8	42.4	15	68.2	858	41.6	90.8
Over \$1 Million	11	30.6		1,755	64.2		7	31.8	1,206	58.4	7.8
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.3
Total	36	100.0		2,734	100.0		22	100.0	2,064	100.0	100.0
By Loan Size											
\$100,000 or Less	30	83.3	91.8	692	25.3	34.3	16	72.7	284	13.8	
\$100,001 - \$250,000	4	11.1	4.4	734	26.8	17.3	4	18.2	730	35.4	
\$250,001 - \$1 Million	2	5.6	3.8	1,308	47.8	48.5	2	9.1	1,050	50.9	
Total	36	100.0	100.0	2,734	100.0	100.0	22	100.0	2,064	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	22	88.0		387	39.5		14	93.3	208	24.2	
\$100,001 - \$250,000	2	8.0		284	29.0		0	0.0	0	0.0	
\$250,001 - \$1 Million	1	4.0		308	31.5		1	6.7	650	75.8	
Total	25	100.0		979	100.0		15	100.0	858	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-34

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Casper MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	2	100.0	71.2	144	100.0	80.4	1	100.0	100	100.0	98.9
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	1.1
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	
Total	2	100.0		144	100.0		1	100.0	100	100.0	100.0
By Loan Size											
\$100,000 or Less	1	50.0	80.3	20	13.9	34.3	1	100.0	100	100.0	
\$100,001 - \$250,000	1	50.0	12.1	124	86.1	28.0	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	7.6	0	0.0	37.7	0	0.0	0	0.0	
Total	2	100.0	100.0	144	100.0	100.0	1	100.0	100	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	1	50.0		20	13.9		1	100.0	100	100.0	
\$100,001 - \$250,000	1	50.0		124	86.1		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	2	100.0		144	100.0		1	100.0	100	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-35

2023 Casper MSA 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	3,956	19.2
Moderate	5	25.0	4,342	21.1	283	6.5	3,941	19.1
Middle	9	45.0	10,102	49.0	802	7.9	4,533	22.0
Upper	6	30.0	6,182	30.0	227	3.7	8,196	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	20,626	100.0	1,312	6.4	20,626	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,753	5,211	22.4	59.5	2,494	28.5	1,048	12.0
Middle	18,203	11,370	49.0	62.5	5,099	28.0	1,734	9.5
Upper	10,204	6,639	28.6	65.1	2,083	20.4	1,482	14.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	37,160	23,220	100.0	62.5	9,676	26.0	4,264	11.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,634	32.4	1,433	31.3	180	45.6	21	31.3
Middle	1,906	37.8	1,758	38.4	133	33.7	15	22.4
Upper	1,499	29.7	1,386	30.3	82	20.8	31	46.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,039	100.0	4,577	100.0	395	100.0	67	100.0
Percentage of Total Businesses:				90.8		7.8		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	18.0	15	17.0	1	100.0	0	0.0
Middle	30	33.7	30	34.1	0	0.0	0	0.0
Upper	43	48.3	43	48.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	89	100.0	88	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-36

2022 Casper MSA 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	3,956	19.2
Moderate	5	25.0	4,342	21.1	283	6.5	3,941	19.1
Middle	9	45.0	10,102	49.0	802	7.9	4,533	22.0
Upper	6	30.0	6,182	30.0	227	3.7	8,196	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	20,626	100.0	1,312	6.4	20,626	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,753	5,211	22.4	59.5	2,494	28.5	1,048	12.0
Middle	18,203	11,370	49.0	62.5	5,099	28.0	1,734	9.5
Upper	10,204	6,639	28.6	65.1	2,083	20.4	1,482	14.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	37,160	23,220	100.0	62.5	9,676	26.0	4,264	11.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,492	31.8	1,297	30.6	181	45.5	14	25.5
Middle	1,821	38.8	1,674	39.5	132	33.2	15	27.3
Upper	1,377	29.4	1,266	29.9	85	21.4	26	47.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,690	100.0	4,237	100.0	398	100.0	55	100.0
Percentage of Total Businesses:				90.3		8.5		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	13	15.3	12	14.3	1	100.0	0	0.0
Middle	29	34.1	29	34.5	0	0.0	0	0.0
Upper	43	50.6	43	51.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	85	100.0	84	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Albany County

Table E-37

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Albany County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	23.8	5.4	1,847	23.1	3.8	1	4.5	3.7	50	1.0	1.6	9.0
Middle	24	57.1	73.2	5,041	62.9	73.6	18	81.8	77.7	4,515	89.2	78.9	73.8
Upper	3	7.1	15.2	781	9.8	18.5	2	9.1	14.5	473	9.3	16.8	13.0
Unknown	5	11.9	6.2	341	4.3	4.0	1	4.5	4.1	26	0.5	2.7	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	42	100.0	100.0	8,010	100.0	100.0	22	100.0	100.0	5,064	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.8	0	0.0	0.8	0	0.0	1.8	0	0.0	0.9	9.0
Middle	2	66.7	80.1	769	82.9	82.1	1	100.0	84.4	225	100.0	86.0	73.8
Upper	0	0.0	14.4	0	0.0	13.9	0	0.0	10.1	0	0.0	9.5	13.0
Unknown	1	33.3	3.7	159	17.1	3.2	0	0.0	3.7	0	0.0	3.6	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	928	100.0	100.0	1	100.0	100.0	225	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	8.8	0	0.0	14.0	0	0.0	1.8	0	0.0	6.0	9.0
Middle	1	50.0	77.2	51	63.0	73.6	0	0.0	89.5	0	0.0	85.8	73.8
Upper	1	50.0	12.3	30	37.0	8.5	0	0.0	7.0	0	0.0	7.9	13.0
Unknown	0	0.0	1.8	0	0.0	3.9	0	0.0	1.8	0	0.0	0.4	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	81	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	5.2
Middle	1	100.0	66.7	400	100.0	78.6	1	100.0	50.0	20	100.0	26.8	79.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	33.3	0	0.0	21.4	0	0.0	50.0	0	0.0	73.2	15.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	400	100.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	18.5	4.5	1,847	18.0	3.0	1	4.0	3.5	50	0.9	1.6	9.0
Middle	34	63.0	75.5	7,095	69.2	76.1	21	84.0	79.1	4,860	89.9	76.9	73.8
Upper	4	7.4	14.5	811	7.9	15.7	2	8.0	13.1	473	8.7	14.8	13.0
Unknown	6	11.1	5.4	500	4.9	5.2	1	4.0	4.3	26	0.5	6.7	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	54	100.0	100.0	10,253	100.0	100.0	25	100.0	100.0	5,409	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-38

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography											
Assessment Area: Albany County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	1	3.0	6.8	1	0.0	7.3	3	7.3	3	0.1	9.0
Middle	25	75.8	79.9	1,941	83.8	80.3	30	73.2	1,715	77.3	77.7
Upper	4	12.1	4.6	372	16.1	3.6	4	9.8	377	17.0	6.3
Unknown	3	9.1	7.4	3	0.1	8.4	4	9.8	123	5.5	7.0
Tract-Unk	0	0.0	1.4	0	0.0	0.3	0	0.0	0	0.0	0.0
Total	33	100.0	100.0	2,317	100.0	100.0	41	100.0	2,218	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-39

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography											
Assessment Area: Albany County											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	1	100.0	100.0	1	100.0	100.0	0	0.0	0	0.0	92.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	7.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	1	100.0	100.0	1	100.0	100.0	0	0.0	0	0.0	100.0
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-40

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Albany County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	2	4.8	4.2	214	2.7	2.2	3	13.6	3.9	256	5.1	1.9	19.0
Moderate	9	21.4	19.2	940	11.7	14.4	2	9.1	14.1	252	5.0	11.1	17.5
Middle	5	11.9	22.9	380	4.7	21.9	0	0.0	22.9	0	0.0	20.7	20.9
Upper	21	50.0	36.2	5,506	68.7	43.8	12	54.5	38.0	3,103	61.3	45.3	42.5
Unknown	5	11.9	17.5	970	12.1	17.7	5	22.7	21.1	1,453	28.7	21.0	0.0
Total	42	100.0	100.0	8,010	100.0	100.0	22	100.0	100.0	5,064	100.0	100.0	100.0
Refinance Loans													
Low	1	33.3	6.3	159	17.1	4.2	0	0.0	10.1	0	0.0	7.0	19.0
Moderate	0	0.0	24.7	0	0.0	19.3	0	0.0	27.5	0	0.0	25.1	17.5
Middle	0	0.0	21.8	0	0.0	20.4	0	0.0	22.9	0	0.0	21.7	20.9
Upper	1	33.3	32.5	375	40.4	40.2	1	100.0	29.4	225	100.0	35.0	42.5
Unknown	1	33.3	14.8	394	42.5	15.9	0	0.0	10.1	0	0.0	11.1	0.0
Total	3	100.0	100.0	928	100.0	100.0	1	100.0	100.0	225	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	10.5	0	0.0	6.2	0	0.0	5.3	0	0.0	2.4	19.0
Moderate	1	50.0	8.8	51	63.0	15.2	0	0.0	8.8	0	0.0	6.7	17.5
Middle	0	0.0	21.1	0	0.0	13.6	0	0.0	22.8	0	0.0	14.6	20.9
Upper	1	50.0	54.4	30	37.0	59.2	0	0.0	59.6	0	0.0	69.8	42.5
Unknown	0	0.0	5.3	0	0.0	5.9	0	0.0	3.5	0	0.0	6.6	0.0
Total	2	100.0	100.0	81	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	7.5	5.1	584	5.9	2.8	3	12.5	5.2	256	4.8	2.6	19.0
Moderate	13	24.5	20.7	1,324	13.4	15.7	2	8.3	15.8	252	4.7	12.8	17.5
Middle	6	11.3	22.4	420	4.3	21.2	0	0.0	23.8	0	0.0	21.0	20.9
Upper	24	45.3	36.4	6,161	62.5	43.4	14	58.3	38.7	3,428	63.6	44.7	42.5
Unknown	6	11.3	15.5	1,364	13.8	16.9	5	20.8	16.4	1,453	27.0	18.9	0.0
Total	53	100.0	100.0	9,853	100.0	100.0	24	100.0	100.0	5,389	100.0	100.0	100.0
Source: 2023 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Table E-41

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Albany County											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	22	66.7	49.0	258	11.1	39.8	25	61.0	763	34.4	92.0
Over \$1 Million	11	33.3		2,059	88.9		10	24.4	1,417	63.9	6.7
Revenue Unknown	0	0.0		0	0.0		6	14.6	38	1.7	1.3
Total	33	100.0		2,317	100.0		41	100.0	2,218	100.0	100.0
By Loan Size											
\$100,000 or Less	27	81.8	91.4	239	10.3	35.9	35	85.4	518	23.4	
\$100,001 - \$250,000	2	6.1	4.4	333	14.4	19.4	3	7.3	600	27.1	
\$250,001 - \$1 Million	4	12.1	4.2	1,745	75.3	44.7	3	7.3	1,100	49.6	
Total	33	100.0	100.0	2,317	100.0	100.0	41	100.0	2,218	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	21	95.5		41	15.9		22	88.0	163	21.4	
\$100,001 - \$250,000	1	4.5		217	84.1		3	12.0	600	78.6	
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	
Total	22	100.0		258	100.0		25	100.0	763	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-42

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Albany County											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	1	100.0	67.9	1	100.0	89.7	0	0.0	0	0.0	100.0
Over \$1 Million	0	0.0		0	0.0		0	0.0	0	0.0	0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	
Total	1	100.0		1	100.0		0	0.0	0	0.0	100.0
By Loan Size											
\$100,000 or Less	1	100.0	82.1	1	100.0	33.7	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	14.3	0	0.0	48.9	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	3.6	0	0.0	17.3	0	0.0	0	0.0	
Total	1	100.0	100.0	1	100.0	100.0	0	0.0	0	0.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	1	100.0		1	100.0		0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0			
Total	1	100.0		1	100.0		0	0.0			
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

Table E-43

2023 Albany County 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	1,496	19.0
Moderate	2	18.2	768	9.8	53	6.9	1,379	17.5
Middle	7	63.6	5,709	72.7	354	6.2	1,644	20.9
Upper	1	9.1	944	12.0	0	0.0	3,339	42.5
Unknown	1	9.1	437	5.6	129	29.5	0	0.0
Total AA	11	100.0	7,858	100.0	536	6.8	7,858	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,480	759	9.0	51.3	547	37.0	174	11.8
Middle	15,302	6,190	73.8	40.5	6,320	41.3	2,792	18.2
Upper	1,308	1,090	13.0	83.3	171	13.1	47	3.6
Unknown	1,324	348	4.1	26.3	712	53.8	264	19.9
Total AA	19,414	8,387	100.0	43.2	7,750	39.9	3,277	16.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	154	9.0	143	9.1	11	9.6	0	0.0
Middle	1,328	77.7	1,218	77.4	90	78.3	20	90.9
Upper	108	6.3	106	6.7	1	0.9	1	4.5
Unknown	120	7.0	106	6.7	13	11.3	1	4.5
Total AA	1,710	100.0	1,573	100.0	115	100.0	22	100.0
Percentage of Total Businesses:				92.0		6.7		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	47	92.2	47	92.2	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	4	7.8	4	7.8	0	0.0	0	0.0
Total AA	51	100.0	51	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table E-44

2022 Albany County 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	1,496	19.0
Moderate	2	18.2	768	9.8	53	6.9	1,379	17.5
Middle	7	63.6	5,709	72.7	354	6.2	1,644	20.9
Upper	1	9.1	944	12.0	0	0.0	3,339	42.5
Unknown	1	9.1	437	5.6	129	29.5	0	0.0
Total AA	11	100.0	7,858	100.0	536	6.8	7,858	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,480	759	9.0	51.3	547	37.0	174	11.8
Middle	15,302	6,190	73.8	40.5	6,320	41.3	2,792	18.2
Upper	1,308	1,090	13.0	83.3	171	13.1	47	3.6
Unknown	1,324	348	4.1	26.3	712	53.8	264	19.9
Total AA	19,414	8,387	100.0	43.2	7,750	39.9	3,277	16.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	150	9.1	141	9.3	9	8.2	0	0.0
Middle	1,287	77.9	1,183	77.7	85	77.3	19	90.5
Upper	102	6.2	100	6.6	1	0.9	1	4.8
Unknown	114	6.9	98	6.4	15	13.6	1	4.8
Total AA	1,653	100.0	1,522	100.0	110	100.0	21	100.0
Percentage of Total Businesses:				92.1		6.7		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	45	91.8	45	91.8	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	4	8.2	4	8.2	0	0.0	0	0.0
Total AA	49	100.0	49	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX F – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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