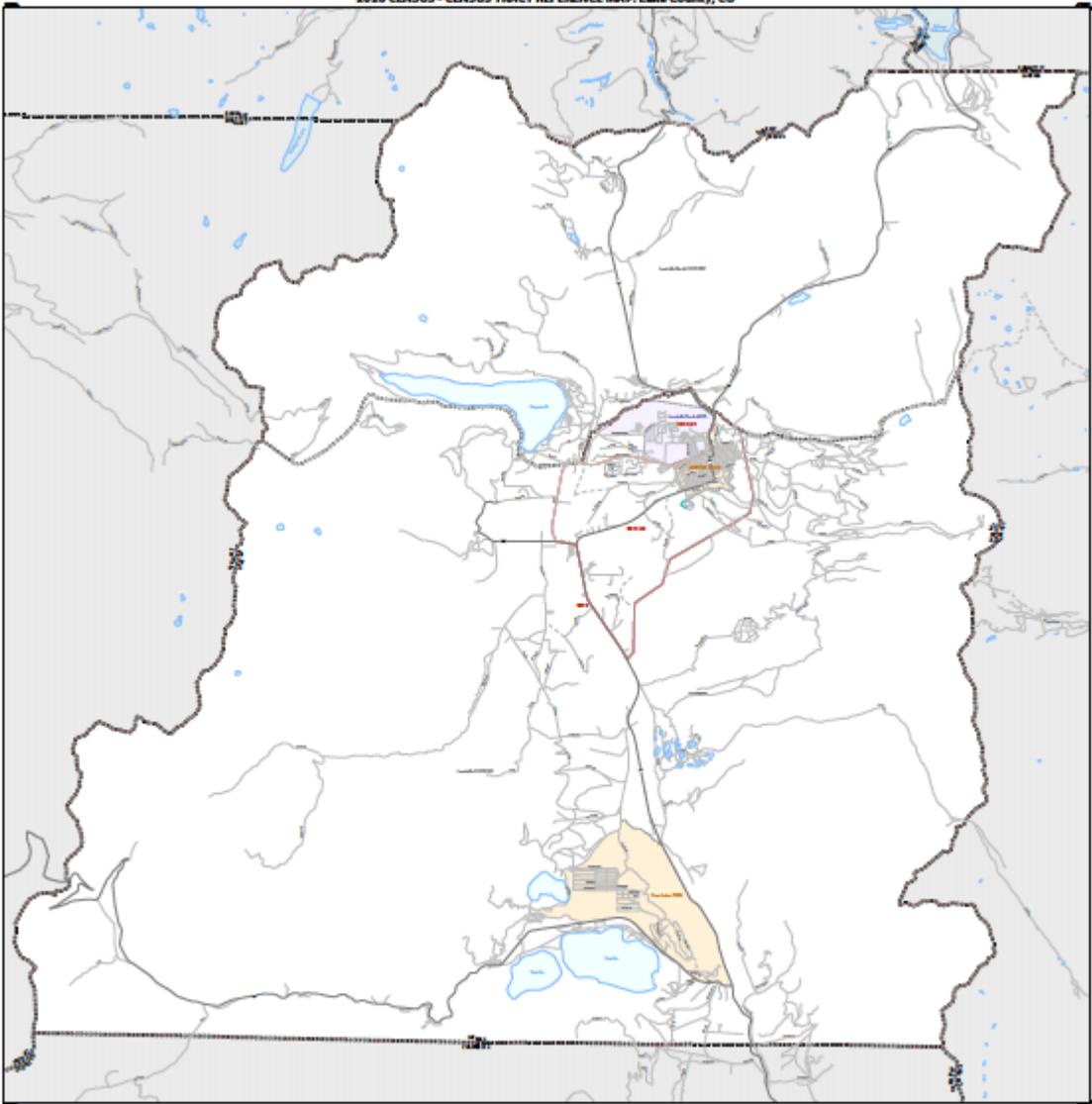


The First National Bank of Hugo, The First National Bank of Hugo-Limon, First Mountain Bank have received no public comments during the current year or in either of the two prior calendar years.

The First National Bank of Hugo, The First National Bank of Hugo-Limon, First Mountain Bank has not opened or closed any branches during the current year or in either of the two prior calendar years.

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Lake County, CO



| Symbol          | Description        |
|-----------------|--------------------|
| Black outline   | County Boundary    |
| Dashed line     | State Boundary     |
| Grey line       | Major Road         |
| Thin grey line  | Minor Road         |
| Blue area       | Water              |
| Green area      | Forest             |
| Yellow area     | Open Space         |
| Purple area     | Urban              |
| Black dots      | Population Density |
| Black squares   | Population Density |
| Black circles   | Population Density |
| Black triangles | Population Density |
| Black diamonds  | Population Density |
| Black hexagons  | Population Density |
| Black octagons  | Population Density |
| Black stars     | Population Density |
| Black crosses   | Population Density |
| Black pluses    | Population Density |
| Black asterisks | Population Density |
| Black dots      | Population Density |
| Black squares   | Population Density |
| Black circles   | Population Density |
| Black triangles | Population Density |
| Black diamonds  | Population Density |
| Black hexagons  | Population Density |
| Black octagons  | Population Density |
| Black stars     | Population Density |
| Black crosses   | Population Density |
| Black pluses    | Population Density |
| Black asterisks | Population Density |



Map of Lake County, Colorado, showing census tracts. The map includes a legend, a scale bar, and a north arrow. The legend describes various symbols used on the map, including population density, roads, water, and land use. The scale bar indicates a distance of 10 miles. The north arrow points towards the top of the map.





**First National Bank of Hugo**  
**First National Bank of Hugo/Limon Branch**  
**First Mountain Bank**  
**A Division of the First National Bank of Hugo**

**Loan Products:**

- **Personal Loans**
  - Vehicle
  - Home
  - Lot Purchase
  - Construction
  - Personal Term Loans
  
- **Agricultural Loans**
  - Operating Notes
  - Land Purchase
  - Machinery/Equipment
  - Cattle Notes
  - Beginning Farmer/Rancher Loans with FSA
  - FSA Guarantee
  - Refinance Loans
  
- **Business Loans**
  - Operating
  - Real Estate
  - Investment Property
  - Machinery/Equipment
  - SBA, USDA and CHFA
  - Refinance
  - Construction
  - Equity Loans

## **First National Bank of Hugo/First National Bank of Hugo-Limon Deposit Products**

- **Student or Senior (Over65) Checking Accounts**
- **Regular Checking Account**
- **Health Saving Accounts**
- **Money Market Account**
- **NOW Account**
- **Super Now Account**
- **Passbook Savings Accounts**
- **Certificate of Deposits**
- **IRA**

## **First Mountain Bank Leadville – Deposit Products**

- **E-Z Checking**
- **Senior Citizen Checking**
- **Business Checking**
- **Business Checking with Interest**
- **High Yield Checking Account**
- **Money Market Account**
- **NOW Account**
- **Super NOW Account**
- **Minor Savings Accounts (16 years of age and under)**
- **Certificate of Deposits**
- **IRA**



Office of the  
Comptroller of the Currency  
Washington, DC 20219

**SMALL BANK**

## **PUBLIC DISCLOSURE**

October 17, 2022

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

The First National Bank of Hugo  
Charter Number 8849

321 4<sup>th</sup> Street  
Hugo, CO 80821

Office of the Comptroller of the Currency

Independence Plaza  
1050 17<sup>th</sup> Street  
Suite 1500  
Denver, CO 80265-1050

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **Overall CRA Rating**

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory**

The major factors that support this rating include:

- The First National Bank of Hugo's (FNBH) loan to deposit ratio is reasonable given the bank's size, financial condition, and market competition.
- FNBH originates a majority of its loans inside the assessment area (AA).
- The bank's geographic distribution of agriculture and consumer loans reflects an excellent distribution across geographies of different income levels within the bank's AA.
- The borrower distribution reflects reasonable penetration of lending to individuals of different incomes and farms of different sizes within the bank's AA.
- The bank received no CRA-related complaints during the evaluation period.

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

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.

FNBH's average quarterly LTD ratio over the evaluation period was 55.7 percent. The bank's ratio ranged from a high of 62.6 percent to a low of 51 percent. The average LTD ratio of four comparable banks operating in the same region was 60.2 percent, with a high-average of 69.4 percent, and a low-average of 51.5 percent during the evaluation period. The bank's LTD ratio is negatively impacted by limited credit demand and competition with other lenders. Additionally, the number of deposits has increased during the evaluation period, which further impacted the ratio. As of December 31, 2019, the bank had total deposits of \$105 million and as of December 31, 2021, deposits totaled \$129 million, which is roughly a 23 percent increase. During discussions with management, examiners were informed the increase in deposits was due to COVID funds and depositors moving funds from a competitor bank in the Leadville market. The lower than peer LTD ratio did not impact the bank's capacity to lend during the evaluation period.

### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA.

Examiners sampled 20 agriculture loans and 20 consumer loans originated between January 1, 2019, and December 31, 2021. Of the 40 loans sampled, FNBH originated and purchased 67.5 percent of loans by number within the AA, and 62 percent in terms of dollar value inside the AA. This analysis is performed at the bank, rather than the AA level.

| Lending Inside and Outside of the Assessment Area |                 |      |         |      |         |                                 |      |         |      |                |
|---|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|
| Loan Category                                     | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |      |         |      | Total \$(000s) |
|   | Inside          |      | Outside |      |         | Inside                          |      | Outside |      |                |
|   | #               | %    | #       | %    |         | \$                              | %    | \$      | %    |                |
| Small Farm  | 12              | 60.0 | 8       | 40.0 | 20      | 2,683.8                         | 61.1 | 1,709.2 | 38.9 | 4,393.0        |
| Consumer  | 15              | 75.0 | 5       | 25.0 | 20      | 194.9                           | 79   | 52.2    | 21   | 247.1          |
| Total   | 27              | 67.5 | 13      | 32.5 | 40      | 2,878.7                         | 62   | 1,761.4 | 38   | 4,640.1        |

## Description of Institution

FNBH is a \$148.8 million community bank headquartered in Hugo, CO, which is located on the eastern plains of Colorado, approximately 90 miles east of Denver. FNBH is a wholly owned subsidiary of the holding company First Liberty Capital Corporation. First Liberty Capital Corporation is also headquartered in Hugo, CO and has consolidated assets of approximately of \$1.4 million. FNBH is a single state institution and has no subsidiaries or related organizations.

As of December 31, 2021, FNBH had total assets of \$145.1 million; \$70.6 million held in the loan portfolio (48.7 percent of total assets), \$20.6 million in agency and treasury securities (14.2 percent of total assets), \$23.3 million in municipal securities (16.1 percent of total assets), \$10.4 million in other securities (7.2 percent of total assets), and \$9.5 million in interest-bearing bank balances (6.5 percent of total assets). The loan portfolio consists of \$54.3 million in real estate loans, \$13 million in agriculture loans, \$2.5 million in consumer loans, and \$2.2 million in commercial loans. Real estate loans are centered in farmland at 44.3 percent, commercial real estate at 14.9 percent, and 1-4 family at 10.6 percent. The tier 1 leverage ratio is 9.5 percent.

The bank's operations fall into a single AA, the Colorado Non-Metropolitan Statistical Area (Colorado Non-MSA). The AA fully encompasses Lincoln and Lake Counties, Colorado, and consists of four census tracts. The bank has a branch in Limon, CO, which is 16 miles northeast of the head office. Both the Hugo and Limon branches are located in Lincoln County, CO. FNBH also has a branch in the mountain community of Leadville, CO (operating as First Mountain Bank) in Lake County, CO. All branches offer non-deposit taking ATMs and night-drops. On the eastern plains of Colorado, FNBH primarily lends to farmers and ranchers with limited traditional consumer and commercial loans. In the Leadville branch, where there is less agricultural activity occurring, the bank focuses on consumer, commercial, and mortgage lending. No mergers or acquisitions occurred during the evaluation period.

FNBH received a Satisfactory rating at the last CRA examination dated September 10, 2018; please refer to the bank's CRA Public File for more information. There are no legal or financial impediments to meeting the credit needs of the AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

Examiners performed a full-scope review of the bank's Community Reinvestment Act performance using the lending test criteria for small banks. The evaluation period includes all loans originated and purchased by bank branches from January 1, 2019, through December 31, 2021. We assessed the loan production during this time to determine the primary lending products by analyzing the total number of loans originated and purchased, as well as the total dollar volume of loans originated and purchased. Based on these criteria, examiners selected consumer and agriculture loans as the primary products. The corresponding volumes by dollar and number are summarized in the table below.

The primary product by dollar volume is agriculture loans at 64.7 percent of total loan originations during the evaluation period. Farm loans consist of both farmland real estate and operating loans. The primary product in terms of number of loans are consumer loans representing 36.1 percent of total originations.

| <b>FNBH Loan Originations<br/>January 1, 2019 to December 31, 2021</b> |         |         |                |         |
|--|---------|---------|----------------|---------|
| Loan Category  | Total # | Total % | Total \$(000s) | Total % |
| Home Mortgage  | 33      | 3.2%    | \$ 8,381.9     | 9.4%    |
| Business   | 303     | 29.6%   | \$ 18,322.6    | 20.5%   |
| Farm   | 318     | 31.1%   | \$ 57,982.5    | 64.7%   |
| Consumer   | 370     | 36.1%   | \$ 4,879.9     | 5.4%    |
| Total  | 1024    | 100%    | \$ 89,567.0    | 100.0%  |

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, the AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated non-MSA AAs located within the same state are combined and evaluated as a single AA. FNBH has identified Lincoln and Lake Counties as their AA. Refer to appendix A, Scope of Examination, for AA details.

### Ratings

The bank's overall rating is based on its performance in the state of Colorado. The state rating is based on performance within the bank's single Colorado AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas are weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

### **State of Colorado**

**CRA rating for the State of Colorado: Satisfactory**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- The bank's geographic distribution of agriculture and consumer loans reflects an excellent distribution across geographies of different income levels within the bank's AA.
- The borrower distribution reflects reasonable penetration of lending to individuals of different incomes and farms of different sizes within the bank's AA.

### **Description of Institution's Operations in Colorado**

Management designated the entirety of Lincoln and Lake Counties as its combined non-Metropolitan Statistical Area. The designated AA consists of two census tracts (CTs) in Lincoln County and two CTs in Lake County for a total of four CTs. None of the CTs are in a low-income area. The AA complies with applicable regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) areas. Lincoln County contains one CT that is identified as a remote rural, underserved middle-income non-metropolitan tract.

The bank maintains three full-service branches within its AA. Each branch includes non-deposit taking ATMs and a night-drop. The bank does not have any deposit-taking ATMs. The bank offers a full line of traditional consumer, commercial, and agricultural products and services.

Based on FDIC deposit market share data as of June 30, 2021, FNBH ranked 1<sup>st</sup> out of 5 banks operating in the local market with 39.6 percent of deposits within the AA. Major competitors in the AA include Nbh Bank, Eastern Colorado Bank, Pueblo Bank and Trust Company, and Equitable Savings and Loan Association.

#### *Community Involvement*

In order to serve the local community, the bank has engaged in activities that provide credit, services, and funds to the region.

#### *Loans:*

During the evaluation period, the bank originated 217 loans under the Small Business Administration's PPP, which amounted to approximately \$6.1 million. These loans helped stabilize the local economy during the initial phases of the COVID-19 pandemic, and primarily benefited small businesses. Commercial loans were not selected as the primary product and are not included in our CRA evaluation.

#### *Services:*

FNBH President Randy Younger is involved in local committees and organizations, offering his expertise in finance. President Younger serves as a board member on the Lincoln County Economic Development Corporation as well as the Secretary for the Executive Committee. The organization is a

non-profit organization focused on business support and community-based development. The organization meets monthly, and Mr. Younger estimated he spends approximately three to four hours per month working with the group.

In addition to volunteering with the Economic Development Corporation, President Younger also served on the Lincoln County Grant Committee. This organization's primary mission was to use excess COVID-19 funds that the county had received and to distribute them to local businesses. Mr. Younger's role was to review the applicants and make decisions on which businesses would receive funds.

*Donations:*

FNBH has made numerous donations to various organizations throughout the community.

*Economic Data:*

Based on economic data from Moody's Analytics Reports dated July 2022, Colorado's economy continues to expand as it recovers from the recession with payrolls reaching prerecession levels for the first time earlier in the year. Employment relative to 2020 ranks among the top 10 nationally and unemployment continues to trend downward. Professional services and manufacturing have powered the state's economy, but job growth has slowed in May and June 2022. Housing prices continue to trend upward ahead of the national average driven by heavy demand from out of state relocations.

## Colorado Non MSA AA

| Table A – Demographic Information of the Assessment Area   |        |               |                              |                  |                 |               |
|--|--------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Colorado Non-MSA  |        |               |                              |                  |                 |               |
| Demographic Characteristics  | #      | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)  | 4      | 0.0           | 25.0                         | 75.0             | 0.0             | 0.0           |
| Population by Geography  | 12,840 | 0.0           | 14.9                         | 85.1             | 0.0             | 0.0           |
| Housing Units by Geography   | 6,678  | 0.0           | 15.6                         | 84.4             | 0.0             | 0.0           |
| Owner-Occupied Units by Geography  | 2,813  | 0.0           | 20.0                         | 80.0             | 0.0             | 0.0           |
| Occupied Rental Units by Geography   | 1,889  | 0.0           | 11.2                         | 88.8             | 0.0             | 0.0           |
| Vacant Units by Geography  | 1,976  | 0.0           | 13.6                         | 86.4             | 0.0             | 0.0           |
| Businesses by Geography  | 1,452  | 0.0           | 15.2                         | 84.8             | 0.0             | 0.0           |
| Farms by Geography   | 143    | 0.0           | 69.9                         | 30.1             | 0.0             | 0.0           |
| Family Distribution by Income Level  | 2,923  | 22.5          | 19.5                         | 20.8             | 37.1            | 0.0           |
| Household Distribution by Income Level   | 4,702  | 27.0          | 17.0                         | 16.1             | 39.8            | 0.0           |
| Median Family Income Non-MSAs - CO   |        | \$60,701      | Median Housing Value         |                  |                 | \$153,201     |
|  |        |               | Median Gross Rent            |                  |                 | \$805         |
|  |        |               | Families Below Poverty Level |                  |                 | 8.4%          |
| <p>Source: 2015 ACS and 2021 D&amp;B Data<br/>           Due to rounding, totals may not equal 100.0%<br/>           (*) The NA category consists of geographies that have not been assigned an income classification.</p> |        |               |                              |                  |                 |               |

***Community Contact:***

In conjunction with the CRA evaluation, examiners held a meeting with the Executive Director of the Lincoln County Economic Development Corporation, which is a non-profit organization focused on business support and community-based development. The organization is funded through grants, local municipalities, and private business funding. During our meeting, we discussed the local economy, major industries in the region, credit needs of the community, and involvement of the local financial institutions. The main industries are Agriculture, Energy, Transportation, and Government operations. With a push for cleaner energy, the region will continue to expand on its wind farms and is looking to supplement wind energy with a solar farm. The largest employer in the region is the government with employees in Lincoln Health, the Department of Transportation, and the Department of Corrections. The community contact indicated they felt confident that banks are meeting the needs of the community. They stated the banks in the community provide crucial support to the businesses and families in the area and often provide support to local businesses and organizations through donations or similar activities. They noted the continued need for affordable housing in the region.

**Scope of Evaluation in Colorado**

A full scope review was performed for FNBH's single non-MSA AA in Colorado as it is the only AA to evaluate. There were no limited scope reviews performed.

Refer to Appendix A for additional details.

**LENDING TEST**

FNBH's lending performance under the Lending Test in Colorado is rated Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review the bank's performance in the Colorado Non-MSA AA is good.

**Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the State.

***Loans to Farms***

Refer to Table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of loans to farms.

The geographic distribution of loans to farms in the AA is excellent overall. There are no low-income CTs in the AA. The bank's percentage of loans to farms in moderate-income CTs is slightly above the percentage of farms in the AA and exceeds the peer aggregate lending performance. In addition, 30 percent of the bank's farm loan sample was made in a middle-income tract that was designated as a distressed and underserved remote rural area.

***Consumer Loans***

Refer to Table U in appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in the AA is excellent overall. There are no low-income CTs in the AA. The bank's percentage of consumer loans in moderate-income CTs is above the percentage of households. In addition, 40 percent of the bank's consumer loan sample was made in a middle-income tract that was designated as a distressed and underserved remote rural area.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### ***Loans to Farms***

Refer to Table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to farms.

The distribution of loans to farms in the AA is reasonable. The bank's percentage of loans to farms is below the percentage of farms in the AA, but significantly exceeds the peer aggregate lending performance for reporting institutions.

#### ***Consumer Loans***

Refer to Table V in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The income distribution of consumer loans in the AA is reasonable. The percentage of the bank's consumer lending to low-income borrowers is slightly below the percentage of low-income households in the AA but still reasonable penetration. The percentage of the bank's consumer lending to moderate-income is above the percentage of moderate-income households. The total number of loans to LMI individuals exceeds the percentage of LMI individuals in the AA.

### **Responses to Complaints**

FNBH did not received any complaints during the evaluation period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

|   |                                      |   |
|---|--------------------------------------|---|
| <b>Time Period Reviewed:</b>                            | January 1, 2019 to December 31, 2021 |   |
| <b>Bank Products Reviewed:</b>                          | Small Farm and Consumer Loans        |   |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>        | <b>Products Reviewed</b>                              |
| N/A   |                                      |   |
| <b>List of Assessment Areas and Type of Examination</b> |                                      |   |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>                  | <b>Other Information</b>                              |
| Colorado  |                                      |   |
| Colorado Non-MSA AA                                     | Full-Scope                           | The AA includes the counties of Lake and Lincoln, CO. |

## Appendix B: Summary of MMSA and State Ratings

---

| RATINGS FNB Hugo                   |                     |
|------------------------------------|---------------------|
| Overall Bank:                      | Lending Test Rating |
| <b>First National Bank of Hugo</b> | <b>Satisfactory</b> |
| State:                             |                     |
| <b>Colorado</b>                    | <b>Satisfactory</b> |

## Appendix C: Definitions and Common Abbreviations

---

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives 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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of loans to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of loans originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of loans to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is

available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of loans originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography**

| Assessment Area: | Total Loans to Farms |                  |              | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |            | Not Available Tract |              |
|------------------|----------------------|------------------|--------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|---------------------|--------------|
|                  | #                    | \$               | % of Total   | % Farms           | % Bank Loans | Aggregate  | % Farms                | % Bank Loans | Aggregate   | % Farms              | % Bank Loans | Aggregate   | % Farms             | % Bank Loans | Aggregate  | % Farms             | % Bank Loans |
| Colorado Non-MSA | 20                   | 5,260,805        | 100.0        | 0.0               | 0.0          | 0.0        | 69.9                   | 70.0         | 58.3        | 30.1                 | 30.0         | 41.7        | 0.0                 | 0.0          | 0.0        | 0.0                 | 0.0          |
| <b>Total</b>     | <b>20</b>            | <b>5,260,805</b> | <b>100.0</b> | <b>0.0</b>        | <b>0.0</b>   | <b>0.0</b> | <b>69.9</b>            | <b>70.0</b>  | <b>58.3</b> | <b>30.1</b>          | <b>30.0</b>  | <b>41.7</b> | <b>0.0</b>          | <b>0.0</b>   | <b>0.0</b> | <b>0.0</b>          | <b>0.0</b>   |

Source: 2021 D&B Data: 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "... data not available.  
Due to rounding, totals may not equal 100.0%

**Table T - Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**

| Assessment Area: | Total Loans to Farms |                  |              | Farms with Revenues <= IMM |              |             | Farms with Revenues > IMM |              |             | Farms with Revenues > IMM |              |
|------------------|----------------------|------------------|--------------|----------------------------|--------------|-------------|---------------------------|--------------|-------------|---------------------------|--------------|
|                  | #                    | \$               | % of Total   | % Farms                    | % Bank Loans | Aggregate   | % Farms                   | % Bank Loans | Aggregate   | % Farms                   | % Bank Loans |
| Colorado Non-MSA | 20                   | 5,260,805        | 100.0        | 24                         | 24           | 99.3        | 90.0                      | 25.0         | 25.0        | 0.7                       | 10.0         |
| <b>Total</b>     | <b>20</b>            | <b>5,260,805</b> | <b>100.0</b> | <b>24</b>                  | <b>24</b>    | <b>99.3</b> | <b>90.0</b>               | <b>25.0</b>  | <b>25.0</b> | <b>0.7</b>                | <b>10.0</b>  |

Source: 2021 D&B Data: 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "... data not available.  
Due to rounding, totals may not equal 100.0%

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2019-21**

| Assessment Area: | Total Consumer Loans |                | Low-Income Tracts |              | Moderate-Income Tracts |              | Middle-Income Tracts |              | Upper-Income Tracts |              | Not Available-Income Tracts |              |
|------------------|----------------------|----------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|
|                  | #                    | \$             | % of Households   | % Bank Loans | % of Households        | % Bank Loans | % of Households      | % Bank Loans | % of Households     | % Bank Loans | % of Households             | % Bank Loans |
| Colorado Non-MSA | 20                   | 233,806        | 0.0               | 0.0          | 16.5                   | 20.0         | 83.5                 | 80.0         | 0.0                 | 0.0          | 0.0                         | 0.0          |
| <b>Total</b>     | <b>20</b>            | <b>233,806</b> | <b>0.0</b>        | <b>0.0</b>   | <b>16.5</b>            | <b>20.0</b>  | <b>83.5</b>          | <b>80.0</b>  | <b>0.0</b>          | <b>0.0</b>   | <b>0.0</b>                  | <b>0.0</b>   |

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

**Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2019-21**

| Assessment Area: | Total Consumer Loans |                | Low-Income Borrowers |              | Moderate-Income Borrowers |              | Middle-Income Borrowers |              | Upper-Income Borrowers |              | Not Available-Income Borrowers |              |
|------------------|----------------------|----------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|
|                  | #                    | \$             | % of Households      | % Bank Loans | % of Households           | % Bank Loans | % of Households         | % Bank Loans | % of Households        | % Bank Loans | % of Households                | % Bank Loans |
| Colorado Non-MSA | 20                   | 233,806        | 27.0                 | 25.0         | 17.0                      | 25.0         | 16.1                    | 10.0         | 39.8                   | 35.0         | 0.0                            | 5.0          |
| <b>Total</b>     | <b>20</b>            | <b>233,806</b> | <b>27.0</b>          | <b>25.0</b>  | <b>17.0</b>               | <b>25.0</b>  | <b>16.1</b>             | <b>10.0</b>  | <b>39.8</b>            | <b>35.0</b>  | <b>0.0</b>                     | <b>5.0</b>   |

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*