



## **PUBLIC DISCLOSURE**

September 16, 2024

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

First Pioneer National Bank  
Charter Number: 8752

145 West Fourth Street  
Wray, CO 80758

Office of the Comptroller of the Currency

Independence Plaza  
1050 17th 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 **Outstanding**.

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

The Lending Test rating is based on:

- First Pioneer National Bank (FPNB) originated majority of loans within the assessment area (AA).
- The borrower distribution reflects an excellent distribution of loans to small farms.
- FPNB's community development (CD) activities demonstrate excellent responsiveness to the CD needs in the AA.
- FPNB's loan-to-deposit (LTD) ratio is reasonable.
- The borrower distribution reflects a reasonable distribution of lending across geographies of different income levels.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The Office of the Comptroller of the Currency (OCC) evaluated the bank's quarterly average LTD ratio for the 20 quarters since the prior CRA examination. During the period, the bank's LTD averaged 60.4 percent. Over the same period, the bank's quarterly LTD ratio ranged from a high of 83.2 percent to a low of 47.4 percent. The ratio is in line with similarly situated institutions. For this evaluation, we compared the LTD ratio to four institutions that are similar in both asset size and location. The average LTD ratio among these other institutions was 63.6 percent, with an average high LTD of 85.2 percent and an average low LTD of 42.8 percent. The LTD ratio is calculated on a bank-wide basis.

### Lending in Assessment Area

A majority of the bank's loans are inside its assessment area(s) (AAs).

FPNB originated and purchased 65.0 percent of total sampled loans inside the bank's AAs during the evaluation period. By dollar volume, the bank originated and purchased 88.1 percent of total sampled loans inside the AA. The OCC did not identify any geographical gaps in lending dispersion. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agriculture	26	65.0	14	35.0	40	7,088	88.1	959	11.9	8,047
<b>Total</b>	<b>26</b>	<b>65.0</b>	<b>14</b>	<b>35.0</b>	<b>40</b>	<b>7,088</b>	<b>88.1</b>	<b>959</b>	<b>11.9</b>	<b>8,047</b>

## Description of Institution

FPNB is a full service, single-state institution headquartered in Wray, Colorado. As of December 31, 2023, FPNB had total assets of \$242.0 million and tier 1 capital of \$28.6 million. FPNB is wholly owned by First Pioneer Bank Corporation (FPBC), a two-bank holding company located in Wray, Colorado with assets of \$44.4 million as of December 31, 2023. FPBC also owns Farmer's State Bank of Brush located in Brush, Colorado. There have been no significant changes in FPNB's corporate structure, including merger or acquisition activities, since the prior CRA examination.

FPNB operates within a single, non-metropolitan statistical assessment area (AA) consisting of Yuma and Phillips counties in northeastern Colorado. Both counties are designated as remote rural underserved communities. FPNB operates two full-service branch locations and two automated teller machines located in Wray and Holyoke, Colorado. Each location offers a full range of products and services. Both locations also offer drive-up services. As of June 30, 2023, FPNB's deposit share in the AA totaled \$196.4 million, ranking second out of nine depository institutions operating within the AA. FPNB has not closed or opened any offices since the prior CRA examination.

FPNB offers a full range of consumer, commercial, and agricultural banking products and services. Additionally, the bank offers online and mobile banking services. These services include funds transfer, bill pay, statement review, and mobile deposit. FPNB participates in the Colorado Agricultural Development Authority (CADA) Beginning Farmer Loan Program. This program provides funding to first-time farmers for the purchase of agricultural land and equipment at below market rates. Agriculture is a primary driver in the local economy, and participation in this program promotes job development and population retention within rural and underserved communities.

FPNB's business strategy is consistent with the geography and economy of its service area. The bank serves community credit needs through a wide array of product offerings, including smaller dollar consumer loans; however, the bank specializes in providing financing to farms and ranches. This specialization is well-suited to the local economy, which is largely agriculturally driven.

As of December 31, 2023, net loans and leases totaled \$113.5 million or 46.9 percent of total assets. The loan portfolio is primarily comprised of \$82.4 million in agricultural-related loans, \$17.9 million in real estate loans, \$7.9 million in consumer loans, and \$6.1 million in commercial loans. As a percent of gross loans, these volumes equate to 71.6, 15.5, 6.9, and 5.3 percent, respectively.

FPNB received an "Outstanding" rating at the previous CRA examination dated May 20, 2019. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC performed a review of the bank's CRA performance using Small Bank examination procedures. The Small Bank procedures include a lending test, which evaluates the bank's record of meeting the credit needs of its AA through its lending activities. Evaluating community development activities is optional under the Small Bank procedures and, at management's request, the OCC reviewed the bank's CD lending, qualified investments, and services.

The lending test included an evaluation of the bank's primary product, agricultural loans, for the evaluation period of January 1, 2021, through December 31, 2023, (lending evaluation period). The OCC evaluated performance using the 2010 U.S. Census data for loans originated in 2021 and the 2020 U.S. Census data for loans originated in 2022-2023. For the CD test, we evaluated the bank's qualified CD activities from January 1, 2021, through December 31, 2023. The evaluation will be weighted with the 2021 period accounting for 1/3 of the rating and the 2022 to 2023 period accounting for 2/3 of the rating for the borrower and geographic distribution tests. All remaining areas of performance are rated based on aggregate performance for the three-year period.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a full-scope review is required for at least one AA. For purposes of this evaluation, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Also refer to appendix A, Scope of Examination, for AA details.

### Ratings

Given the institution operates within a single AA located in Colorado, our overall conclusions were entirely based on the Colorado assessment results.

## **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: Outstanding

#### The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- FPNB exhibited a reasonable geographic distribution of loans.
- FPNB exhibited an excellent distribution of loans to small farms.
- FPNB community Development (CD) activities demonstrated an excellent responsiveness to the CD needs within the AA.

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

FPNB operates within a single, non-metropolitan statistical AA consisting of Yuma and Phillips counties in northeastern Colorado. Both counties are designated as remote rural underserved communities. FPNB operates two full-service branch locations and two automated teller machines located in Wray and Holyoke, Colorado.

As of June 30, 2023, there were 9 deposit-taking institutions within the entire counties of Yuma and Phillips. FPNB ranked second with a market share of 25.7 percent based on total deposits of \$196.4 million.

FPNB offers a full range of consumer, commercial, and agricultural banking products and services. Additionally, the bank offers online and mobile banking services. These services include funds transfer, bill pay, statement review, and mobile deposit. FPNB participates in the Colorado Agricultural Development Authority (CADA) Beginning Farmer Loan Program. This program provides funding to first-time farmers for the purchase of agricultural land and equipment at below market rates. Agriculture is a primary driver in the local economy and participation in this program promotes job development and population retention within rural and underserved communities.

FPNB's business strategy is consistent with the geography and economy of its service area. The bank serves community credit needs through a wide array of product offerings, including smaller dollar consumer loans; however, the bank specializes in providing financing to farms and ranches. This specialization is well-suited to the local economy, which is largely agriculturally driven.

As a part of this evaluation, examiners conducted interviews with community contacts to assess the local credit needs and the community's outlook on how well the local banks support those needs in the AA. The community contact in the AA noted that credit needs center around small farm operating lines and home mortgage loans. The contact stated that local banks do a great job of supporting community needs. While some farmers do utilize banks out of the local area, the local banks continue to support local

farmers. The contact also stated that the local banks are very active in the community by supporting local fundraisers and many different programs.

Yuma and Phillips Counties

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Yuma and Phillips Counties 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,556	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,377	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,635	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,941	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	801	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	2,026	0.0	0.0	100.0	0.0	0.0
Farms by Geography	535	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,426	22.5	19.2	21.9	36.4	0.0
Household Distribution by Income Level	5,576	25.1	19.2	20.3	35.3	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Housing Value			\$135,229
			Median Gross Rent			\$637
			Families Below Poverty Level			9.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Yuma and Phillips Counties 2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	50.0	50.0	0.0	0.0
Population by Geography	14,518	0.0	57.6	42.4	0.0	0.0
Housing Units by Geography	6,553	0.0	61.0	39.0	0.0	0.0
Owner-Occupied Units by Geography	4,144	0.0	64.2	35.8	0.0	0.0
Occupied Rental Units by Geography	1,701	0.0	59.2	40.8	0.0	0.0
Vacant Units by Geography	708	0.0	46.6	53.4	0.0	0.0
Businesses by Geography	2,895	0.0	58.5	41.5	0.0	0.0
Farms by Geography	662	0.0	51.5	48.5	0.0	0.0
Family Distribution by Income Level	4,125	25.9	22.4	18.6	33.0	0.0
Household Distribution by Income Level	5,845	20.7	20.9	20.1	38.3	0.0
Median Family Income Non-MSAs - CO		\$72,390	Median Housing Value			\$190,957



	Median Gross Rent	\$800
	Families Below Poverty Level	7.9%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>		

## Scope of Evaluation in Colorado

FPNB operations in on AA, consisting of Yuma and Phillips Counties. This AA was evaluated using a full-scope review. Please reference the table in Appendix A for additional information on the AA.

## LENDING TEST

The bank's performance under the Lending Test in Colorado is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Yuma and Phillips Counties AA is excellent.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

### *Small Loans to Farms*

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

The percentage of loans in moderate-income CTs in the reviewed sample is below the percentage of farms and aggregate lending figures in moderate-income census tracts for the 2022-2023 period. There were no low-income CTs in the AA during the 2022-2023 period. There were no low- or moderate-income CTs in 2021 so a geographic distribution analysis for this period would not be meaningful.

FPNB's underperformance in lending to moderate income CTs is attributed to heavy competition for agricultural lending in the AA. Lending statistics in 2022 show agricultural lending is highly concentrated in the top two lenders: Bank of Colorado and John Deere Financial, FSB who together represented 85.8 percent of lending in moderate income CTs. Additionally, the top 5 lenders in 2022 represent 97.0 percent of agricultural lending in moderate income CTs in the AA. Also limiting FPNB's lending activity is the lack of local branch exposure in the moderate-income CT in Yuma County and numerous local alternatives providing similar agricultural products. Based on these circumstances the bank's geographic distribution performance is considered satisfactory.

## Distribution of Loans by Income Level of the Borrower

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

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

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

The percentage of loans made to small farms in the reviewed sample is lower than the percentage of farms in the AA but significantly exceeds aggregate industry lending figures in both the 2021 and 2022-2023 periods. Data was not collected on a small percentage of loans sampled that were certificate of deposit secured in both periods. Examiners weighted the bank's performance relative to the aggregate lending industry more heavily as it provides more meaningful indication of market service levels in the AA.

### **Responses to Complaints**

FPNB did not receive any CRA-related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. Performance related to community development activities had a positive effect on the bank's rating in the state.

### **Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Yuma and Phillips/AA	4	100	\$5,683	100

FPNB provided the AA with 4 CD loans totaling \$5.7 million or 18.8 percent of tier 1 capital plus ACL. The loans funded the purchase of farm real estate, development of a local hospital serving LMI, and for the construction of workforce housing in an underserved county. In one instance the bank provided \$550,000 in funding to first-time farmers for the financing of agricultural real estate. This CD loan is considered particularly responsive to community needs by preserving low-and moderate-income (LMI) jobs and creating economic development.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Yuma and Phillips/AA	2	301	10	1,503	12	100	1,804	100	0	0

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

FPNB's qualified investments include 10 current period investments and direct contributions and 2 prior period investments. Investment and contribution activity totaled \$1.8 million or 6.0 percent of tier 1 capital plus ACL. Investments included \$1.26 million in bond investment targeting affordable housing organizations in the AA and a \$225,000 bond investment benefiting an LMI school district in the AA.

### Extent to Which the Bank Provides Community Development Services

FPNB performed services benefiting several organizations in the AA totaling 2,622 hours during the evaluation period. Bank staff and management provided CD services including serving on LMI organization boards, providing financial expertise, and providing financial education to LMI youth in the AA.

## 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>	01/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Small Farm Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	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>
<b>Colorado</b>		
Yuma & Phillips AA	Full-scope	Whole counties of Yuma & Phillips

# Appendix B: Summary of State Ratings

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RATINGS	FIRST PIONEER NATIONAL BANK
Overall Bank:	Lending Test Rating
First Pioneer National Bank	Outstanding
State:	
Colorado	Outstanding

## Appendix C: Definitions and Common Abbreviations

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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.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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.



**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 small loans (less than or equal to \$1 million) 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 small loans (loans less than or equal to \$1 million) 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) 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 small loans (loans less than or equal to \$500 thousand) 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2022-23</b>	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Yuma & Phillips Counties 2023	20	3,264	100	336	0.0	0.0	0.0	51.5	30.0	71.1	48.5	70.0	28.9	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>3,264</b>	<b>100</b>	<b>336</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>51.5</b>	<b>30.0</b>	<b>71.1</b>	<b>48.5</b>	<b>70.0</b>	<b>28.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Yuma & Phillips Counties 2021	20	7,879	100.0	517	96.1	75.0	30.0	2.1	20.0	1.9	5.0
<b>Total</b>	<b>20</b>	<b>7,879</b>	<b>100.0</b>	<b>517</b>	<b>96.1</b>	<b>75.0</b>	<b>30.0</b>	<b>2.1</b>	<b>20.0</b>	<b>1.9</b>	<b>5.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 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											2022-23
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Yuma & Phillips Counties 2023	20	3,264	100.0	336	96.7	80.0	43.8	1.7	15.0	1.7	5.0
<b>Total</b>	<b>20</b>	<b>3,264</b>	<b>100.0</b>	<b>336</b>	<b>96.7</b>	<b>80.0</b>	<b>43.8</b>	<b>1.7</b>	<b>15.0</b>	<b>1.7</b>	<b>5.0</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.