



Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank in Trinidad
Charter Number 14222

100 East Main Street
Trinidad, CO 81082

Office of the Comptroller of the Currency

Denver Office
1050 17th Street, Suite 1500
Denver, Colorado 80202

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 bank's loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance.
- A substantial majority of the bank's loans are made inside the assessment area (AA).
- The bank exhibited excellent geographic distribution of loans in the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different incomes.

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 bank's average quarterly LTD ratio for the 16 quarter since the last evaluation period is 41.2 percent. The average of similarly situated banks during the same period is 50.7 percent with quarterly averages ranging from a high of 63.4 percent to a low of 43.5 percent. The First National Bank in Trinidad's (FNBT) LTD over this period had a high of 58.4 percent and a low of 31.5 percent. Similarly situated banks have comparable asset sizes, similar business lines, and operate in the same geographies. The LTD ratio is calculated on a bank wide basis.

Bank management indicated the lower LTD ratio average compared to peer banks resulted from a high increase in deposits due to pandemic relief programs. During 2021 and through the second quarter of 2022 lending activity was also relatively flat leading to a significant decrease in the LTD ratio with a low of 31.5 percent. As these deposits have left the bank in 2022 and 2023 and with loan production increasing during this time, the bank's LTD has steadily increased to the high of 58.4 percent in the fourth quarter of 2023. This percentage is consistent with bank performance prior to the effects of deposit inflows from pandemic relief programs.

Lending in Assessment Area

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

The bank originated and purchased 80.0 percent of its total loans inside the bank's AA during the evaluation period. 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. The sample consisted of 20 loans from 2021 covering the 2010 census period and 20 loans from 2022-2023 covering the 2020 census period.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
Colorado Non-MSA	32	80.0	8	20.0	40	4,534	65.2	2,424	34.8	6,958
Total	32	80.0	8	20.0	40	4,534	65.2	2,424	34.8	6,958

Description of Institution

FNBT is a nationally chartered community bank headquartered in Trinidad, CO. FNBT is a single-state institution with \$294.3 million in assets as of December 31, 2023. The bank continues to be wholly owned by Republic Trinidad Corporation, a single bank holding company located in Houston, TX. FNBT does not have any affiliates. There were no acquisitions or mergers during the evaluation period.

FNBT's operates in one AA in southern Colorado. The Colorado Non-MSA AA is comprised of the two adjacent counties of Las Animas and Huerfano. The bank operates two branches and a drive through motor bank in Trinidad, one branch in Walsenburg, CO, and a loan production office in Raton, NM. The bank has a total of eight non-deposit taking ATMs with five located in branches and three standalone ATMs.

As of December 31, 2023, the bank's net loans represented 43.8 percent of total assets. The loan portfolio is primarily comprised of real estate loans totaling \$124.3 million (94.9 percent of gross loans). The remainder of the portfolio is comprised of commercial, non-real estate loans totaling \$3.8 million (2.9 percent), individual loans totaling \$1.9 million (1.5 percent), and agricultural loans totaling \$902 thousand (0.7 percent). Tier 1 capital as of December 31, 2023, was \$27.9 million with a tier one leverage ratio of 9.9 percent.

FNBT received a "Satisfactory" rating on its previous CRA examination dated September 14, 2020. There were no 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 evaluation period for the Lending Test covered loan originations from January 1, 2021, through December 31, 2023. Examiners reviewed loan activity during this period to determine the bank's primary loan product as the focus for this evaluation. A summary of the FNBT's lending activity during the evaluation period is detailed in the table below. The table reflects mortgage lending as the bank's primary product, representing the highest number of loan originations and the highest dollar volume of originations during the evaluation period.

First National Bank in Trinidad Loan Originations from January 1, 2021, to December 31, 2023		
Loan Type	% Of Total by Number	% Of Total by Dollar Volume
Consumer	32.0	4.3
Mortgage	47.9	68.5
Commercial	15.3	19.4
Agricultural	4.9	7.8
Total	100.0	100.0

Examiners also considered that the evaluation period spanned two census periods, 2010 and 2020. Borrower and geographic distribution testing in 2021 was evaluated using 2010 census data, and performance in 2022 and 2023 was evaluated using 2020 census data. The relative performance in each period was aggregated to determine the bank's overall performance. The evaluation was 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, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on the performance in the bank's single AA.

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 exhibited excellent geographic distribution of loans in the AA.
- The bank exhibited a reasonable distribution of loans to borrowers of different incomes.

Description of Institution's Operations in Colorado

FNBT's operations in the state of Colorado include traditional banking and lending products and also includes online and mobile banking. Lending activity is focused primarily on mortgage and consumer lending. FNBT maintains three bank branches, one drive through motor bank, and seven ATMs in southeastern Colorado. Bank operations are centered in a single AA made up of Las Animas and Huerfano Counties.

FNBT ranks first in the Colorado Non-MSA AA for total deposit market share with 47.4 percent of deposits, totaling \$245.6 million as of June 30, 2023. The institution faces moderate competition for deposits in the area with five institutions in the market, including Century Savings and Loan Association, InBank, Bank of the West, 5-Star Bank, and NBH Bank.

FNBT also faces moderate lending competition in the CO Non-MSA AA with the top 5 mortgage lenders in the AA representing 29.9 percent of total loan originations during the 2022-2023 period. Top competitors include ENT Credit Union, Rocket Mortgage, and United Wholesale Mortgage.

Economy

According to the Moody's Analytics report dated July 2024, Colorado's economy is improving following disappointing performance in 2023. Payrolls have grown on par with the nation in the first half of 2024. Recent growth was driven by government and healthcare industries, and the mining sector has recently shown improvements. Professional and business services are taking steps in the right direction following recent volatility. Housing prices have declined slightly driven in part by increased supply.

Employment

The main employment sectors in both Huerfano and Las Animas Counties include educational services, healthcare and social services, leisure and hospitality services, and public administration based on 2020 Census data. Top employers include Mt. San Rafael Hospital, Phil Long Toyota, Spanish Peaks Regional Health Center, and South-Central Council of Governments. As of December 31, 2023, the unemployment rate in Las Animas County was 5.1 percent and 5.7 percent in Huerfano County. This is

compared to the state of Colorado at 3.3 percent and the national unemployment rate of 3.7 percent. The AA median family income ranges during the evaluation period are detailed below.

Table B – Median Family Income Ranges – CO Non-MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2021 (\$73,500)	<\$36,750	\$36,750 to <\$58,800	\$58,800 to <\$88,200	≥\$88,200
2022 (\$82,500)	<\$41,250	\$41,250 to <\$66,000	\$66,000 to <\$99,000	≥\$99,000
2023 (\$90,900)	<\$45,450	\$45,450 to <\$72,720	\$72,720 to <\$109,080	≥\$109,080
<i>Source: FFIEC</i>				

Housing

The overall homeownership rate in the AA was 49.5 percent as of year-end 2023. Current US Census data indicates the median property value in the AA was \$184,619, and the median gross rent was \$714. In 2023 household income for low-income families was less than \$45,450 and ranged between \$45,450 and \$72,720 for moderate-income families.

Examiners conducted an affordability analysis in the AA to determine the affordability of housing to low and moderate income (LMI) borrowers. The cost of housing and its accessibility to LMI families is reflected in the level of homeowners with housing costs that exceed 30.0 percent of their income, which is a standard for benchmark affordability. To illustrate the issue of housing affordability, a low-income borrower making \$45,450 could afford a monthly housing payment of \$1,136. Assuming a 30-year fixed rate mortgage of 7.0 percent, and the 2020 US Census average home value of \$184,619 with no down payment, the mortgage monthly payment would be \$1,228. This does not include additional expenses related to homeowner's insurance, real estate taxes or monthly expenses of the borrower.

Colorado Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Colorado Non-MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	25.0	75.0	0.0	0.0
Population by Geography	21,005	0.0	30.6	69.4	0.0	0.0
Housing Units by Geography	13,348	0.0	29.8	70.2	0.0	0.0
Owner-Occupied Units by Geography	6,215	0.0	27.6	72.4	0.0	0.0
Occupied Rental Units by Geography	2,635	0.0	37.3	62.7	0.0	0.0
Vacant Units by Geography	4,498	0.0	28.5	71.5	0.0	0.0
Businesses by Geography	2,215	0.0	29.0	71.0	0.0	0.0
Farms by Geography	184	0.0	20.7	79.3	0.0	0.0
Family Distribution by Income Level	5,514	25.3	20.8	23.0	30.9	0.0
Household Distribution by Income Level	8,850	32.6	16.8	19.2	31.4	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Housing Value			\$156,400
			Median Gross Rent			\$736

	Families Below Poverty Level	9.8%
<i>Source: 2015 ACS and 2021 D&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>		

Table A – Demographic Information of the Assessment Area						
Assessment Area: Colorado Non-MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	55.6	44.4	0.0	0.0
Population by Geography	21,375	0.0	61.1	38.9	0.0	0.0
Housing Units by Geography	13,845	0.0	55.4	44.6	0.0	0.0
Owner-Occupied Units by Geography	6,852	0.0	57.5	42.5	0.0	0.0
Occupied Rental Units by Geography	2,955	0.0	76.5	23.5	0.0	0.0
Vacant Units by Geography	4,038	0.0	36.5	63.5	0.0	0.0
Businesses by Geography	3,306	0.0	58.9	41.1	0.0	0.0
Farms by Geography	255	0.0	28.2	71.8	0.0	0.0
Family Distribution by Income Level	5,709	31.3	22.0	19.7	27.0	0.0
Household Distribution by Income Level	9,807	35.5	18.6	18.4	27.6	0.0
Median Family Income Non-MSAs - CO		\$72,390	Median Housing Value			\$184,619
			Median Gross Rent			\$714
			Families Below Poverty Level			13.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Community Contact

To assess community needs in the AA, examiners utilized a community contact from the evaluation period. The contact represents an affordable housing organization in the AA. The contact indicated the local economy is doing poorly, and low-income residents' salaries are insufficient to support families. Additionally, housing inventory is low and housing costs are high for these borrowers. The contact indicated housing and employment are the primary needs of the community, and credit needs are secondary. The contact indicated there are several banks in the AA providing sufficient banking resources, and banks support the local communities where they can.

Scope of Evaluation in Colorado

Examiners performed a full scope examination of FNBT's single AA in the state of Colorado. See Appendix A for details.

LENDING TEST

The bank's 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 is good.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The percentage of loans in the reviewed sample made in moderate-income census tracts exceeds aggregate figures in both the 2021 and the 2022-2023 periods. The percentage of loans sample exceeds the demographic comparators in the 2021 period and is in line with demographics in the 2022-2023 period. The bank did not have any low-income CT in the AA during the review period.

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.

Home Mortgage Loans

Refer to Table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The percentage of loans in the reviewed sample made to low- and moderate-income borrowers exceeds aggregate figures and the percentage of low- and moderate-income families in the 2021 period. The percentage of loans sampled made to moderate-income families is in line with aggregate figures and the percentage of moderate-income families in the 2022-2023 period. Lending to low-income borrowers in the reviewed sample is below both the percentage of low-income families and aggregate lending in the 2022-2023 period.

The bank's lower percentage of loans to low-income borrowers compared to the demographic figures in the 2022-2023 period is impacted by the high poverty level in the AA. 13.8 percent of low-income families are below the poverty level in the AA based on 2020 census data. As mentioned previously, the higher cost of housing relative to low-income family income statistics presents challenges to home affordability. Bank management indicated increasing housing prices coupled with increasing interest rates during the evaluation period led to a decrease in home affordability and a decrease in the number of individual low-income borrower applications. This adversely affected originations to low-income borrowers.

Responses to Complaints

FNBT did not receive any CRA related complaints during the review period.

Appendix A: Scope of Examination

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”.

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Colorado	Full-Scope	

Appendix B: Summary of State Ratings

RATINGS	FIRST NATIONAL BANK IN TRINIDAD
Overall Bank:	Lending Test Rating
First National Bank in Trinidad	Satisfactory
State:	
Colorado	Satisfactory

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.

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

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 30th 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Non-MSA	20	2,723	100.0	851	0.0	0.0	0.0	27.6	35.0	24.8	72.4	65.0	75.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,723	100.0	851	0.0	0.0	0.0	27.6	35.0	24.8	72.4	65.0	75.2	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Non-MSA	40	7,223	100.0	354	0.0	0.0	0.0	57.5	57.5	55.1	42.5	42.5	44.9	0.0	0.0	0.0	0.0	0.0	0.0
Total	40	7,223	100.0	354	0.0	0.0	0.0	57.5	57.5	55.1	42.5	42.5	44.9	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Non-MSA	20	2,723	100.0	851	25.3	30.0	11.9	20.8	30.0	18.6	23.0	20.0	19.9	30.9	20.0	31.1	0.0	0.0	18.6
Total	20	2,723	100.0	851	25.3	30.0	11.9	20.8	30.0	18.6	23.0	20.0	19.9	30.9	20.0	31.1	0.0	0.0	18.6
Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Non-MSA	40	7,223	100.0	354	31.3	7.5	12.1	22.0	20.0	20.9	19.7	30.0	25.7	27.0	42.5	26.0	0.0	0.0	15.3
Total	40	7,223	100.0	354	31.3	7.5	12.1	22.0	20.0	20.9	19.7	30.0	25.7	27.0	42.5	26.0	0.0	0.0	15.3
Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA 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.