# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

June 1, 2020

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Las Animas Charter Number 6030

> 535 Bent Avenue Las Animas, CO 81054

Office of the Comptroller of the Currency Denver Field Office 1225 17th Street, Suite 450 Denver, CO 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 Outstanding.

The lending test is rated: Outstanding

The community development test is rated: Outstanding

The major factors that support this rating include:

- First National Bank of Las Animas's (FNBLA) average loan-to-deposit (LTD) ratio is more than reasonable.
- FNBLA originated a substantial majority of loans within its assessment areas (AAs).
- FNBLA exhibits an excellent geographic distribution of loans.
- FNBLA's community development (CD) activities demonstrate excellent responsiveness to CD needs in the AAs.

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

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is more than reasonable. Since the prior CRA examination dated May 22, 2017, FNBLA's quarterly average LTD ratio was 79 percent. This is more than reasonable compared to the average LTD ratio of similarly situated banks and given local economic conditions. Similarly situated banks' LTD ratios averaged 73 percent over the same period (similarly situated banks have similar asset sizes or banks with similar primary products operating within similar geographies).

#### **Lending in Assessment Area**

A substantial majority of the bank's loans are inside its AAs. The bank originated and purchased 70 percent of its total loans inside the AAs during the evaluation period. Considering the bank originates a substantial volume of small-dollar consumer loans, a greater weight was put on the number of loans originated rather than dollar amount of loans originated 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. See the table below for lending inside and outside of the AA.

Lending Inside and Outside of the Assessment Area													
	N	Number o	of Loans			Dollar A	000s)	_ ,					
Loan Category	Insid	de	Outsio	de	Total	Inside	e	Outsio	Total				
	#	%	#	%	#	\$	%	\$	%	\$(000s)			
Agriculture	16	80	4	20	20	2,268	71	930	29	3,199			
Consumer	19	95	1	5	20	205	94	14	5	220			
Commercial	7	35	13	65	20	3,938	54	3,391	46	7,328			
Total	42	70	18	30	60	6,411	60	4,335	40	10,747			

## **Description of Institution**

FNBLA is a \$381 million institution headquartered in Las Animas, CO. FNBLA is wholly-owned by First Bankshares of Las Animas, Inc., and does not have any other affiliates. In addition to the main office, the bank also operates five other branches in the Colorado communities of Fowler, La Junta, Monument, Ordway, and Rocky Ford. The bank has recently opened another branch in the Monument area. However, due to the recency of the branch opening, CRA activities from this location during the review period are limited.

The bank has two distinct assessment areas. The first is the Las Animas assessment area, which includes the counties of Baca, Bent, Crowley, Kiowa, Las Animas, Otero, and Prowers. This assessment area comprises the majority of the bank's operations as it includes five of the bank's branches. Additionally, four of the counties in this AA are designated as either distressed, underserved, or both. The second assessment area includes the Monument, CO branch. This assessment area includes census tract codes of northern El Paso County. There are no low-or moderate-income census tracts in this AA.

FNBLA offers traditional banking products but is primarily an agriculture and commercial lender. The bank's loan portfolio totals \$280 million and is primarily comprised of agriculture real estate and agriculture production loans, which total \$123 million. Commercial loans, including real estate and construction, total \$100 million. Residential real estate totals \$47 million, consumer loans total \$5 million, and other loans total a remaining \$5 million. Tier 1 capital totals \$47 million.

FNBLA received an "Outstanding" rating on its previous CRA examination dated May 22, 2017. There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

FNBLA was evaluated under the intermediate-small bank procedures. This includes a lending test and CD test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities, and the CD test evaluates the bank's responsiveness to community development through CD lending, investments, and services.

The evaluation period included loan originations from January 1, 2017, through December 31, 2019. Examiners determined the primary loan products in each AA by establishing the concentration of loans originated by number and dollar volume for each loan type. In the Las Animas AA, primary products were determined to be agriculture and consumer loans. In the Monument AA, the primary product was determined to be commercial loans.

#### Selection of Areas for Full-Scope Review

This performance evaluation included full-scope reviews for both the Las Animas and Monument AAs. As the majority of bank operations occurred in the Las Animas AA, more weight was placed on CRA activities in this AA for the overall rating.

#### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Given both AAs are within the state of Colorado, the overall conclusion was entirely reliant 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.

Charter Number: 6030

## **State Rating**

#### State of Colorado

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

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

• FNBLA originated a substantial majority of loans within its AAs.

- FNBLA exhibits an excellent distribution of loans throughout the state.
- FNBLA's CD activities demonstrate excellent responsiveness to CD needs in the AAs.

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

While FNBLA offers a traditional line of banking and lending products at each of its branch locations, operations in the state of Colorado are focused primarily on agriculture lending in the Las Animas AA and commercial lending in the Monument AA. The bank operates six branches and six ATMs.

FNBLA faces strong competition for deposits in its markets, particularly in the Monument AA. There are 37 FDIC-insured depository institutions in El Paso county. In this AA, FNBLA has one percent of the market share totaling \$74 million in deposits. In the Las Animas AA, FNBLA ranks first in total deposit market share with 18 percent of market share totaling \$255 million.

Examiners contacted community representatives in both assessment areas as part of the evaluation. Community representatives provided examiners with information regarding the community profiles, opportunities for participation in community development by local financial institutions, and perception of local financial institutions in the community.

#### Las Animas Assessment Area

Table A – Der	mographic I	nformation	of the Assessr	nent Area										
Assessment Area: Las Animas AA														
Demographic Characteristics	01# % 01# % 01# % 01# % 01#													
Geographies (Census Tracts)	23	4.3	52.2	43.5	0.0	0.0								
Population by Geography	61,920	4.5	57.4	38.2	0.0	0.0								
Housing Units by Geography	29,731	4.6	55.3	40.1	0.0	0.0								
Owner-Occupied Units by Geography	15,706	4.2	53.9	42.0	0.0	0.0								
Occupied Rental Units by Geography	7,385	5.8	54.6	39.6	0.0	0.0								
Vacant Units by Geography	6,640	4.1	59.5	36.4	0.0	0.0								
Businesses by Geography	4,101	4.0	53.1	42.9	0.0	0.0								

Farms by Geography	562	0.5	59.8	39.7	0.0	0.0
Family Distribution by Income Level	15,486	29.4	21.7	21.2	27.6	0.0
Household Distribution by Income Level	23,091	33.8	18.1	18.4	29.7	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Hous	\$104,686		
		Median Gross		\$657		
	Families Belo	evel	14.9%			

Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0%

## Monument Assessment Area

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
A	Assessment .	Area: Moni	ument AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	0.0	12.5	75.0	12.5
Population by Geography	56,252	0.0	0.0	3.6	89.6	6.8
Housing Units by Geography	19,198	0.0	0.0	3.3	96.7	0.0
Owner-Occupied Units by Geography	14,861	0.0	0.0	0.0	100.0	0.0
Occupied Rental Units by Geography	3,256	0.0	0.0	15.8	84.2	0.0
Vacant Units by Geography	1,081	0.0	0.0	11.7	88.3	0.0
Businesses by Geography	7,789	0.0	0.0	1.2	98.2	0.6
Farms by Geography	191	0.0	0.0	0.0	100.0	0.0
Family Distribution by Income Level	15,174	7.6	8.9	16.0	67.5	0.0
Household Distribution by Income Level	18,117	9.7	7.1	14.6	68.6	0.0
Median Family Income MSA - 17820 Colorado Springs, CO MSA		\$71,351	Median Housi		\$376,160	
			Median Gross	Rent		\$1,362
			Families Belov	w Poverty Lev	vel	3.0%

Source: 2015 ACS and 2019 D&B Data

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Due to rounding, totals may not equal 100.0%
(\*) The NA category consists of geographies that have not been assigned an income classification.

## **Scope of Evaluation in Colorado**

A full-scope review was performed for FNBLA's two AAs in the state of Colorado.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

#### LENDING TEST

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

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's lending performance in the state of Colorado is excellent.

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

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

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

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

#### Small Loans to Farms

The review of small loans to farms found excellent distribution to farms of different income levels. All of the loan originations in the review were to farms with annual revenues of less than \$1 million.

The review of small loans to farms found excellent geographic distribution throughout the Las Animas AA. The distribution of loans in moderate-income census tracts significantly outperforms area demographics.

Refer to Table S and Table T in 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.

#### Small Loans to Businesses

The review of small loans to business originations found a reasonable distribution of loans to businesses of different income levels in the AA. While the distribution of loans to borrowers with annual revenues of less than \$1 million is slightly below area demographics, it is still within a reasonable tolerance.

The review of small loans to businesses found a reasonable geographic distribution of loans. As the Monument AA does not include any low-or moderate-income census tracts, it is reasonable that all loans in the sample were located in upper-income census tracts.

Refer to Table Q and Table R in appendix D for the facts and data used to evaluate the geographic distribution and income distribution of the bank's originations and purchases of small loans to businesses.

#### Consumer Loans

The review of consumer loans found a reasonable distribution of loans to borrowers of different income levels. In the sample, the distribution of low-or moderate-income borrowers is slightly below area demographics but still within reasonable tolerances.

The review of consumer loans found an excellent geographic distribution of loans throughout the AA. FNBLA significantly outperforms area demographics in originating consumer loans in low-or moderate-income geographic areas.

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

#### **Responses to Complaints**

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

#### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Colorado is rated Outstanding.

## **Conclusions for Areas Receiving Full-Scope Reviews**

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 areas.

FNBLA appropriately directed the majority of CD activities to the Las Animas AA based on critical needs, significant bank presence, and the lack of financial services within several communities in this AA. The majority of schools within this AA serve student populations with over 50 percent of students receiving free or reduced lunches, the vast majority of CTs within the AA are designated as low- and moderate-income (LMI) or middle-distressed geographies, and over 50 percent of families are LMI. In contrast, the Monument AA does not serve schools with over 50 percent of students receiving free and reduced lunches, there are no LMI or middle-distressed geographies, and less than 17 percent of families are LMI. Given the geographies served and demographic profile of this AA, there are limited opportunities for the bank to provide CD activities in this AA; however, FNBLA provided CD activities serving the broader El Paso County and statewide needs.

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

The Community Development Loans Table, shown below, sets forth the information 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.

Community Dev	elopme	ent Loans										
	Total											
Assessment Area	#	% of Total #	\$(000's)	% of Total \$								
Las Animas	165	97.06	15,326	93.70								
Monument	5	2.94	1,031	6.30								

During the evaluation period, FNBLA provided 170 CD loans totaling over \$16.3 million within its AAs. This represents an excellent level of CD loans. The loans helped provide 105 units of affordable housing to LMI families. Further, FNBLA provided over \$6.5 million in loans to promote economic stability through permanent job creation or retention in LMI and distressed middle-income geographies. FNBLA also provided over \$800,000 in loan funds directed towards essential community services in LMI and distressed middle-income geographies.

Additionally, given limited opportunities to provide CD loans within the Monument AA, FNBLA provided an additional \$2.9 million in CD loans within the broader El Paso County area. These loans included \$2 million for the purpose of providing affordable housing, over \$800,000 to promote

economic stabilization through permanent job retention, and \$50,000 to support a medical facility targeted to LMI individuals.

## **Number and Amount of Qualified Investments**

Qualified Investr	nents										
	Pric	or Period*	C	Current		7		Unfunded			
Assessment			I	Period				Commitments**			
Area	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)	
		, , ,		, , , ,		Total #		Total \$		, ,	
Las Animas	0	0	204	165	204	94.01	165	95.93	-	-	
Monument	0	0	13	7	13	5.99	7	40.70	-	-	

<sup>\*</sup> 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, including any prior period investments that remain outstanding as of the examination date.

During the evaluation period, the bank provided 217 donations totaling over \$172,000 within the designated AAs. Given the bank's responsiveness to needs within each of the respective AAs, the OCC also considered an additional \$8,000 in donations and \$1.7 million in investments that served the broader statewide area. This represents good responsiveness to the CD needs within the AA and within the broader statewide area. Donations within the AAs included 158 donations to community programs with a focus on providing youth programs to LMI individuals, 30 donations to various other organizations providing critical community services in LMI geographies, 25 donations to organizations promoting economic development/stabilization in LMI and middle-distressed geographies, and two donations to organizations with a primary purpose of providing affordable housing to LMI families. Within the broader statewide area, the bank invested in three municipal bonds totaling \$1.7 million providing funds to schools/districts serving large populations of LMI students and/or operating in LMI geographies.

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

FNBLA's level of qualified community services demonstrates excellent responsiveness to the CD needs within each AA. A total of 27 bank employees and directors or 44.2 percent of full-time equivalent staff provided over 2,500 hours of community development services within the AAs. Bank staff employed expertise from their respective roles in the institution to serve organizations providing a variety of community services-including several healthcare and youth-related programs, organizations focused on providing affordable housing solutions, and organizations focused on economic development and revitalization. In a majority of instances, bank employees demonstrated leadership within these organizations by serving in the role of director, president, and/or treasurer.

# **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 MSA(s) and non-MSA(s) 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:	01/01/2017 to 12/31/2019										
Bank Products Reviewed:	Loans: Small business, small	farm, and consumer loans.									
	Community Development: Community development loans, qualified investment										
	and community development services.										
Affiliate(s)	Affiliate Relationship	Products Reviewed									
N/A	N/A	N/A									
List of Assessment Areas and Type o	f Examination										
Rating and Assessment Areas	Type of Exam	Other Information									
State											
Colorado											
Las Animas AA	Eull Coope	AA includes counties of: Baca, Bent, Crowley,									
Las Allillas AA	Full-Scope	Kiowa, Las Animas, Otero, and Prowers.									
Manymant A A	Eull Coope	AA includes census tract codes of northern El Paso									
Monument AA	Full-Scope	County.									

# **Appendix B: Summary of State Ratings**

		INGS											
First National Bank of Las Animas													
Lending Test CD Test Overall Bank/State/													
Overall Bank: Rating* Rating Multistate Rating													
First National Bank of Las Animas	Outstanding	Outstanding	Outstanding										
State:													
Colorado Outstanding Outstanding Outstanding													

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

# **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 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 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 arrogate 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.
- 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.
- **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.

## Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2017-19

	Total Loans to Small Businesses Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts						
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Monument AA	20	8,501	100	1,715	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.0	0.2	98.2	100	99.3	0.6	0.0	0.5
Total	20	8,501	100	1,715	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.0	0.2	98.2	100	99.3	0.6	0.0	0.5

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2017-19

	Т	Total Loans to S	Small Businesso	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank % Businesses		% Bank Loans	
Monument AA	20 8,501		100	1,715	93.2	80	55.2	2.2	20	4.6	0.0	
Total	20	8,501	100	1,715	93.2	80	55.2	2.2	20	4.6	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

2017-19

	Total Loans to Farms Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			<b>Upper-Income Tracts</b>			Not Available-Income Tracts						
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Las Animas AA	20	2,476	100	340	0.5	0.0	0.0	59.8	75	74.7	39.7	25	25.3	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,476	100	340	0.5	0.0	0.0	59.8	75	74.7	39.7	25	25.3	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table T	٦.	Assessment	Area	Distribution	of Loans	to Farms	hv	Gross	Annual Revenue	S
I I abic I		11330331110111	INICA	Distribution	oi Loans	to raring	$\mathbf{v}$	O1 033	annuai ixcecinuc	/J

2017-19

		Total Loa	ns to Farms		Farms with Revenues <= 1MM			Farms with Ro	evenues > 1MM	Farms with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Las Animas AA	20	2,476	100	340	97.7	100	70.0	1.8	0.0	0.5	0.0	
Total	20	2,476	100	340	97.7	100	70.0	1.8	0.0	0.5	0.0	

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table U: Assessr	ment Area	a Distribu	tion of Co	nsumer Loan	s by Inco	me Category	of the Geo	graphy					2017-19
	Total Consumer Loans			Low-Incom	ome Tracts   Moderate-Income Tracts   Middle-Income Tracts   Upper-Income Tracts				ne Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Las Animas AA	20	208	100	4.7	15	54.1	60	41.2	25	0.0	0.0	0.0	0.0
Total	20	208	100	4.7	15	54.1	60	41.2	25	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessi	nent Area	a Distribu	tion of Co	nsumer Loan	s by Inco	me Category	of the Bor	rower					2017-19
	Total	Consumer	Loans	Low-Income	Borrowers	Moderate- Borrov		Middle-Income	Borrowers	Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Las Animas AA	20	208	100	33.8	20	18.1	15	18.4	30	29.7	35	0.0	0.0
Total	20	208	100	33.8	20	18.1	15	18.4	30	29.7	35	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0%