



## **PUBLIC DISCLOSURE**

April 11, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Canyon Community Bank, National Association  
Charter Number: 24049

7981 North Oracle Road  
Tucson, AZ 85704

Office of the Comptroller of the Currency

1551 North Tustin Avenue  
Suite 1050  
Santa Ana, CA 92705

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.**

Canyon Community Bank (CCB or bank) has demonstrated a satisfactory record of meeting community credit needs consistent with its resources and capabilities. The major factors that support the rating include:

- a reasonable loan-to-deposit ratio (LTD),
- a majority of the bank's loans are inside its assessment area (AA),
- a reasonable geographic distribution of business loans in the AA,
- a reasonable distribution of loans to businesses of different sizes, and
- CCB did not receive any Community Reinvestment Act (CRA)-related complaints during this evaluation period.

The Lending Test rating is based on CCB's performance in the Tucson Metropolitan Statistical Area (MSA).

### 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 quarterly average LTD ratio for 12 quarters between March 31, 2019 and December 31, 2021 was 71 percent. During this period, the ratio ranged from a quarterly low of 44.9 percent to a quarterly high of 93.9 percent. The bank's LTD ratio is comparable to the quarterly average over the same period of two similarly situated banks in the bank's AA. The average quarterly ratio for these banks was 74.3 percent and ranged from a low of 65.8 percent to a high of 82.8 percent.

### Lending in Assessment Area

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

The bank originated and purchased 70 percent by number and 81 percent by dollar amount 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 inside and outside analysis is based on a sample of business loans originated during this period.

In 2020 and 2021, the bank participated in the Paycheck Protection Program (PPP). The program was designed to provide financial relief for businesses nationwide due to the COVID-19 pandemic, and participation in this program aligns with the spirit of the CRA. Business loans made by the bank under the PPP program in 2020 and 2021 did not materially impact the inside/outside ratio.

<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		
	#	%	#	%		\$	%	\$	%	
Business Loans	14	70	6	30	20	14,065	81	3,216	19	17,281

Source: Bank Data for Evaluation period of January 1, 2019 to December 31, 2021  
Due to rounding, totals may not equal 100.0

## Description of Institution

CCB is an intrastate full-service community bank chartered in October 2000. It is located in the northeast section of Pima County in Tucson, Arizona. CCB is wholly owned by CCBS Holdings LLC (CCBS), a one-bank holding company located in Dallas, Texas with consolidated assets of \$160.3 million as of December 31, 2021. It has no affiliate relationships. CCB currently operates a main office and one branch, both located in northeast Pima County in an upper-income census tract. The bank offers traditional banking products, and both locations have a deposit-taking automated teller machine (ATM) on-site and offer drive-up teller access.

The bank's primary strategy is to provide commercial banking services to small and medium-sized businesses, business professionals, and residents of northeast Pima County. CCB's primary lending focus is on commercial real estate and commercial and industrial lending products. CCB was an active participant in the PPP lending program and extended 159 PPP loans throughout the evaluation period. In 2021, CCB was designated as a minority owned financial institution and ranked number one in commercial lending by the Independent Community Bankers of America for banks under \$500 million in assets.

As of December 31, 2021, CCB reported total assets of \$160 million, net loans of \$107 million, total deposits of \$134 million, and total equity capital of \$15 million. The following chart summarizes the loan portfolio by major loan type.

<b>Canyon Community Bank Loan Portfolio Summary As of December 31, 2021</b>		
<b>Loan Category</b>	<b>(\$000)</b>	<b>% of Outstanding Dollars</b>
Commercial Real Estate	62,692	57.7
Commercial & Industrial	30,052	27.6
Construction & Land Development	7,578	6.9
1-4 Family Residential	3,210	2.9
Multifamily	5,078	4.6
Consumer	0	0.0
<b>Total</b>	<b>108,610</b>	<b>100</b>

Source: December 31, 2021 Call Report  
Due to rounding, totals may not equal 100.0%

There are no financial impediments that hinder the bank's ability to help meet the credit needs of the AA. During the period under review, the bank's operations were subject to a regulatory enforcement action that was terminated on November 30, 2021. The bank received a "Needs to Improve" rating at the March 18, 2019, CRA examination.

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) evaluated the bank's performance under the Small Bank CRA examination procedures due to its asset size. Based on loan originations between January 1, 2019 through December 31, 2021, the bank's primary lending product was business loans.

The OCC sampled 20 business loans originated, renewed, or purchased during the evaluation period to calculate the inside/outside AA ratio. To perform the remaining lending tests, the OCC considered all business loans originated, renewed, or purchased inside the AA during the evaluation period. In total, OCC reviewed 220 business loans totaling \$75 million.

### **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 AA 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 appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a based on a full-scope review of performance in the Tucson MSA.

## **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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Arizona

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

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- a majority of business loans were originated inside its AA,
- a reasonable distribution of loans to businesses of different sizes, and
- a reasonable geographic distribution of business loans in the AA.

## Description of Institution’s Operations in Arizona

CCB operates in the state of Arizona with two branches in the Tucson MSA. While the bank does offer online account opening, the primary method of account opening is through the bank’s physical locations. In 2020, the bank closed their loan production office located in Phoenix, AZ. The AA does not arbitrarily exclude any low-to-moderate geographies.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Pima County</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)	241	7.9	27.8	32.0	31.5	0.8
Population by Geography	998,537	9.1	27.1	31.2	32.1	0.5
Housing Units by Geography	446,769	8.8	27.1	31.6	32.4	0.1
Owner-Occupied Units by Geography	238,329	4.7	21.4	32.9	41.0	0.0
Occupied Rental Units by Geography	151,329	14.9	35.4	29.3	20.2	0.3
Vacant Units by Geography	57,111	10.0	28.4	32.1	29.4	0.1
Businesses by Geography	125,786	6.0	22.1	28.5	42.4	1.0
Farms by Geography	2,576	5.9	21.6	33.0	39.2	0.3
Family Distribution by Income Level	239,972	22.2	17.3	19.1	41.4	0.0
Household Distribution by Income Level	389,658	24.7	16.1	16.9	42.3	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$57,457	Median Housing Value			\$172,844
			Median Gross Rent			\$846
			Families Below Poverty Level			13.3%
<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>						

The bank's Pima County AA is a part of the Tucson, AZ MSA which consists of 241 census tracts. The city of Tucson is the most significant city in the AA. It is the second largest city in Arizona behind Phoenix with a population of 993,000. Pima County has shown steady population growth over recent years. According to the US Census, Pima County's population size increased by 0.8 percent from April 2020 to July 2021. This is relatively higher compared to the national population growth of 0.1 percent in the same period.

The banking environment within the bank's AA is highly competitive. According to the June 2021 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, CCB ranks 14 out of 20 financial institutions within Pima County. Major large competitors include Wells Fargo Bank, NA., JPMorgan Chase Bank, NA., and Bank of America, NA. These top three institutions, combined, hold 70.7 percent of the deposit market share.

According to Moody Analytics, the 'Government' and 'Education and Health Services' are the largest industries in Tucson. Major employers of the city include Raytheon Missile Systems, University of Arizona and Davis-Monthan Air Force Base. Unemployment within Pima County rebounded to pre-covid levels. According to the Bureau of Labor Statistics, the unemployment rate for Pima county as of December 2021 is 2.9 percent compared to the height of 13.2 percent in April 2020. The unemployment rate for Pima County is lower than the national unemployment rate of 3.9 percent.

As of 2021, CCB's AA had 125,786 businesses. Approximately 90.2 percent of the businesses were small, with gross annual revenues of \$1 million or less; 2.3 percent were large businesses with gross annual revenues over \$1 million; and 7.5 percent consist of businesses where income data was not collected or not reported.

### **Community Contact**

One community contact was conducted as part of this performance evaluation. The community contact's organization focused on providing accessible, fair, and responsible loans to economically underserved small businesses outside the economic mainstream. The contact identified small dollar loans for small businesses as a credit need.

### **Scope of Evaluation in Arizona**

CCB only serves the Pima County AA. The OCC performed a full-scope evaluation of the bank's only AA using the Small Bank CRA procedures. There were no limited-scope review areas. CCB's primary loan products, based on originations and purchases during the evaluation period are business loans.

### **Lending Test**

The bank's performance under the Lending Test in the state of Arizona is rated Satisfactory.

### **Conclusions for Pima County AA, Receiving a Full-Scope Review**

Based on a full scope review, the bank's performance in the Pima County AA is reasonable. The analysis of the lending test is based on the bank's primary product business loans.



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

The bank exhibits reasonable geographic distribution of loans in the State of Arizona. The geographic distribution conclusion is based on the bank's performance of lending to businesses located in geographies of different income levels within the Pima County AA.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Arizona 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 businesses.

The bank exhibits reasonable geographic distribution of loans within the AA. The bank's lending in low-income geographies of 10.0 percent exceeded both the peer aggregate of 7.4 percent and the demographic of 6.0 percent. For moderate-income geographies, the bank's lending of 22.0 percent meets the area demographics of 22.1 percent but is slightly lower than the peer aggregate of 25.3 percent.

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

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

### ***Small Loans to Businesses***

Refer to Table R in the state of Arizona 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 businesses.

The bank's distribution of small business loans within the AA is reasonable. The bank's lending to businesses with revenues less than or equal to \$1 million is significantly below the percentage of small businesses in the AA but exceeds the peer comparator in each year reviewed.

In 2019, the bank's lending to businesses with revenues less than \$1 million was 54.5 percent, which was below the business demographics of 87.6 percent, but exceeded the peer comparator of 49.4 percent. In 2020, the bank's lending to businesses with revenues less than or equal to \$1 million was 45.4 percent, which was below the business demographics of 90.7 percent, but exceeded the peer comparator of 42.5 percent. In 2021, the bank's lending to businesses with revenues less than or equal to \$1 million was 57.1 percent, which was below the business demographics of 90.2 percent, but exceeded the peer comparator of 42.5 percent. For the years 2020 and 2021, examiners excluded PPP loans from the sample as revenue information was not available and not required for these loans. During 2020, over 83 percent of the bank's loans were PPP loans with an average loan size of \$147,844 and a median size of \$57,016. During 2021, over 67 percent of the bank's loans were PPP loans with average size of \$145,860 and a median size of \$59,445. While the bank was focused on PPP lending in 2020 and 2021, once the program ended in May 2021, CCB's loan demand from smaller businesses was limited due to economic uncertainty, competition, reduced business opportunities and government funding.

## **Responses to Complaints**

The OCC and the bank have not received any CRA-related complaints in the evaluation period.

## **Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Commercial real estate and commercial/industrial (business) loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Pima County, AZ	Full-Scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Canyon Community Bank
Overall Bank:	Lending Test Rating
<b>Canyon Community Bank</b>	<b>Satisfactory</b>
MMSA or State:	
<b>Arizona</b>	<b>Satisfactory</b>

## 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.



- 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.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Pima County	220	75,426	100	19,825	6.0	10	7.4	22.1	22	25.3	28.5	35	28.9	42.4	32	37.3	1.0	1	1.0	
<b>Total</b>	<b>220</b>	<b>75,426</b>	<b>100</b>	<b>19,825</b>	<b>6.0</b>	<b>10</b>	<b>7.4</b>	<b>22.1</b>	<b>22</b>	<b>25.3</b>	<b>28.5</b>	<b>35</b>	<b>28.9</b>	<b>42.4</b>	<b>32</b>	<b>37.3</b>	<b>1.0</b>	<b>1</b>	<b>1.0</b>	

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Pima County	61	52,034	100	19,825	90.2	52.5	42.5	2.2	45.8	7.5	1.7	
<b>Total</b>	<b>61</b>	<b>52,034</b>	<b>100</b>	<b>19,825</b>	<b>90.2</b>	<b>52.5</b>	<b>42.5</b>	<b>2.2</b>	<b>45.8</b>	<b>7.5</b>	<b>1.7</b>	

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