



PUBLIC DISCLOSURE

September 14, 2020

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

1225 17th Street
Suite 450
Denver, CO 80202-5534

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 Lending Test rating is based on:

- A substantial majority of the banks loans are made inside the assessment areas (AAs).
- The bank's loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance.
- The geographic distribution in the Colorado Non-MSA AA is reasonable.
- The borrower distribution reflects a reasonable penetration of home mortgage and consumer loans across the bank's AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable. The bank's average quarterly LTD ratio since the last examination is 49 percent. The average of similarly situated banks during the same period is 55 percent with quarterly averages ranging from a high of 80 percent to a low of 33 percent. The First National Bank in Trinidad (FNBT)'s LTD over this period had a high of 52 percent and a low of 46 percent. Similarly situated banks have comparable asset sizes with similar business lines and operate in the same geographies. The LTD ratio is calculated on a bank wide basis.

Lending in Assessment Area

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

The bank originated or purchased 95 percent of its total loans inside the bank's AAs 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.

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	19	95	1	5	20	2,016	99	15	1	2,031
Consumer	19	95	1	5	20	156	90	16	10	172
Total	38	95	2	5	40	2,172	99	31	1	2,203

*Source: Evaluation Period: 1/1/2017-12/31/2019 Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

FNBT is a federally chartered community bank headquartered in Trinidad, CO. FNBT is a multi-state institution with \$206 million in assets as of December 31, 2019. The bank is wholly owned by Republic Trinidad Corporation, a single bank holding company located in Houston, TX. FNBT does not have any other affiliates.

FNBT's rating area is made up of two AAs; one in southern Colorado and an adjacent AA in northern New Mexico. The Colorado AA is made up of the two contiguous counties of Las Animas and Huerfano. The New Mexico AA is limited to the single county of Colfax. The bank operates two branches and a drive through motor bank in Trinidad, one branch in Walsenberg, CO, and they maintain a loan production office in Raton, NM. The bank maintains a total of eight ATMs with five located in branches and three standalones. One of the standalone ATMs is a deposit taking ATM in Raton, NM.

As of December 31, 2019, the bank's net loans represented 46 percent of total assets. The loan portfolio is primarily made up of real estate loans totaling \$91 million. Commercial, non real estate loans total \$1.8 million, individual loans total \$1.7 million, and agricultural loans total \$1.2 million. The bank maintains a satisfactory capital position with tier one capital totaling \$25.4 million and a tier one leverage ratio of 12.15 percent.

FNBT received a "Satisfactory" rating on its previous CRA examination dated June 6, 2016. 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 included loan originations from January 1, 2017 through December 31, 2019. We determined the primary loan product for the Lending Test by establishing the concentration of loans originated during the evaluation period by number and dollar volume for each loan type. A summary of the loan originations is included in the table below. Based on the highest number of loans being concentrated in consumer loans and the highest dollar volume of loans being concentrated in mortgage loans, we selected consumer and mortgage loans as our primary products.

First National Bank in Trinidad Loan Originations from January 1, 2017 to December 31, 2019		
Loan Type	% of total by Number	% of total by Dollar
Consumer	47	8
Mortgage	39	66
Commercial	11	18
Agricultural	3	9
Total	100	100

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the coronavirus pandemic are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full scope review. For purposes of this evaluation, bank delineated AAs 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 a blend of the two state ratings. More weight was given to the Colorado state rating based on the higher concentration of customer deposits, with 96.5 percent of total deposits coming from the state of Colorado and 3.5 percent of total deposits coming from the state of New Mexico.

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 Colorado

CRA rating for the State of Colorado¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different incomes given the product lines offered by the bank.
- The bank exhibits reasonable geographic distribution of loans in the state.

Description of Institution’s Operations in Colorado

FNBT operations in the state of Colorado include a traditional line of banking and lending products. 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 42.84 percent of deposits totaling \$184.7 million. The institution faces competition in the area with four other institutions in the market including Century Savings and Loan Association, InBank, Bank of the West, and NBH Bank.

We held discussions with community contacts as part of our evaluation. The first contact indicated the economy is doing well with an active housing market and rental market at 100 percent occupancy that is spilling over into neighboring towns. The contact indicated the town is growing and there are lending opportunities in the areas of residential construction, commercial construction, and small business loans. A second contact indicated that banks have developed more conservative lending standards as of late but are still doing a good job of meeting the needs of the community.

Colorado Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Colorado Non-MSA AA						
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

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

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	1,747	0.0	27.2	72.8	0.0	0.0
Farms by Geography	132	0.0	18.9	81.1	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 2019 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>						

Scope of Evaluation in Colorado

We performed a full-scope review of FNBT's single AA in the state of Colorado. There were no limited scope reviews performed as there was only one AA to review. Please see appendix A for details. More weight was given to the mortgage lending performance as it represented a higher percentage of the bank's lending by dollar amount.

LENDING TEST

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

Conclusions for Colorado non-MSA AA

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable 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.

Our review of mortgage loan originations found a reasonable geographic distribution of loans in the AA. FNBT's lending was in line with census demographics and aggregate lending performance for moderate-income census tracts in the AA for the evaluation period based on the sample reviewed. The AA does not have any low-income census tracts.

Consumer Loans

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

Our review of consumer loan originations found an excellent geographic distribution of loans in the AA. FNBT's lending significantly exceeded census demographics for moderate-income census tracts in the AA for the evaluation period based on the sample reviewed. The AA does not have any low-income census tracts.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different incomes 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.

Our review of home mortgage loan originations found a poor distribution of loans to borrowers of different income levels in the AA. FNBT's lending outperformed aggregate lending to low income borrowers but significantly underperformed demographic comparators. FNBT's lending significantly underperformed both census demographic and aggregate statistics for moderate-income borrowers. Management indicated the low penetration was influenced by a strong housing market with high home costs that were prohibitive to low- and moderate-income borrowers.

Consumer Loans

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

Our review of consumer loan originations found an excellent distribution of loans to borrowers of different income levels in the AA. FNBT's lending significantly exceed census demographics to both low- and moderate-income borrowers in the AA for the evaluation period based on the sample reviewed.

Responses to Complaints

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

State Rating

State of New Mexico

CRA rating for the State of New Mexico²: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.

Description of Institution's Operations in New Mexico

FNBT operations in the state of New Mexico include a traditional line of banking and lending products. Lending activity is focused primarily on mortgage and consumer lending. FNBT does not have any branches in New Mexico, however, they have a loan production office and one deposit taking ATM in northern New Mexico. Bank operations are centered in a single AA in Colfax county.

Deposit share information was not available because the bank does not have a physical branch in the AA but only a deposit taking ATM. Competition in the area is mild with four competitors including InBank, FNB New Mexico, Wells Fargo Bank N.A., and Washington Federal Bank National Association.

We had discussions with a local community contact as part of our evaluation. The contact indicated the local economy has been stagnant due to a decreasing population and seasonal businesses who struggle in the winter months. The primary credit need in the area is for small businesses. The contact indicated strict underwriting guidelines at local banking institutions limit the credit availability for consumer and business borrowers in the area.

New Mexico Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: New Mexico Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	12,997	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	10,067	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,871	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,675	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	4,521	0.0	0.0	100.0	0.0	0.0

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Businesses by Geography	872	0.0	0.0	100.0	0.0	0.0
Farms by Geography	31	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,303	23.5	18.8	18.0	39.8	0.0
Household Distribution by Income Level	5,546	31.8	16.4	15.3	36.5	0.0
Median Family Income Non-MSAs - NM		\$49,356	Median Housing Value			\$136,747
			Median Gross Rent			\$593
			Families Below Poverty Level			15.6%
<i>Source: 2015 ACS and 2019 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>						

Scope of Evaluation in New Mexico

We performed a full-scope review of FNBT's single AA in the state of New Mexico. There were no limited scope reviews performed as there was only one AA to review. Please see appendix A for details. More weight was given to the mortgage lending performance as it represented a higher percentage of the bank's lending by dollar amount.

LENDING TEST

The bank's performance under the Lending Test in New Mexico is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

A geographic analysis was not performed for the New Mexico Non-MSA AA as the analysis would not be meaningful because all the census tracts in the AA are middle income.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of New Mexico 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.

Our review of home mortgage loan originations found an excellent distribution of loans to borrowers of different income levels in the AA. FNBT's lending significantly exceeds census demographics and the aggregate lending performance of the AA for the combined low- and moderate-income borrowers in the assessment area. Lending performance to low-income borrowers underperformed census demographic figures but significantly outperformed aggregate lending figures. Lending performance to moderate

income borrowers significantly outperformed both the census demographic and aggregate lending figures.

Consumer Loans

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

Our review of consumer loan originations found a reasonable distribution of loans to borrowers of different income levels in the AA. Lending to moderate-income borrowers exceeded demographic comparators. Lending to low-income borrowers underperformed area demographics by a significant margin as seen in Table P. In our review we noted a significant portion of the low-income population is comprised of families whose income is below the poverty level. The underperformance is attributable to the high level of families below the poverty level in the AA. In the 2017-2019 period, of the 31.2 percent of low-income families, 49.1 percent were below the poverty level. Management also indicated they faced high competition in the area from payday lenders, further limiting their opportunities to supply credit 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:	01/01/2017 – 12/31/2019	
Bank Products Reviewed:	Home mortgage, consumer loans. Mortgage loans were more heavily weighted due to the higher percentage of originations by dollar volume.	
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	The results from this state were more heavily weighted due to a higher concentration in customer deposits.
New Mexico	Full Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	First National Bank in Trinidad
Overall Bank:	Lending Test Rating
First National Bank in Trinidad	Satisfactory
MMSA or State:	
Colorado	Satisfactory
New Mexico	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.
- 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
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	5,040	100	541	0.0	0.0	0.0	27.6	25.0	27.9	72.4	75.0	72.1	0.0	0.0	0.0	0.0	0.0	0.0	
Total	40	5,040	100	541	0.0	0.0	0.0	27.6	20.0	27.9	72.4	80.0	72.1	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 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																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% 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	5,040	100	541	25.3	13.0	10.4	20.8	10.0	20.7	23.0	23.0	20.3	30.9	55.0	30.5	0.0	0.0	18.1	
Total	40	5,040	100	541	25.3	13.0	10.4	20.8	10.0	20.7	23.0	20.0	20.3	30.9	60.0	30.5	0.0	0.0	18.1	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2017-19
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Colorado Non-MSA	20	154	100	0.0	0.0	30.5	50.0	69.5	50.0	0.0	0.0	0.0	0.0	
Total	20	154	100	0.0	0.0	30.5	50.0	69.5	50.0	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 - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017-19
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Colorado Non-MSA	20	154	100	32.6	50	16.8	25	19.2	10	31.4	10	0.0	5	
Total	20	154	100	32.6	50	16.8	25	19.2	10	31.4	10	0.0	5	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
New Mexico Non-MSA	20	1,522	100	324	23.5	15.0	4.0	18.8	40.0	4.9	18.0	10.0	11.7	39.8	35.0	64.5	0.0	0.0	14.8	
Total	20	1,522	100	324	23.5	15.0	4.0	18.8	40.0	4.9	18.0	10.0	11.7	39.8	35.0	64.5	0.0	0.0	14.8	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017-19	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
New Mexico Non-MSA	41	412	100	31.8	7.3	16.4	22.0	15.3	19.5	36.5	31.7	0.0	19.5		
Total	41	412	100	31.8	7.3	16.4	22.0	15.3	19.5	36.5	31.7	0.0	19.5		

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