



PUBLIC DISCLOSURE

July 27, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Solera National Bank
Charter Number 24737

319 S. Sheridan Blvd.
Lakewood, CO 80226

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 major factors that support this rating include:

- The Lending Test rating is based on:
 - The bank's loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance.
 - The borrower distribution reflects an excellent penetration of commercial loans to small businesses in the bank's assessment area (AA).
 - The geographic distribution of commercial loans is excellent.
- The bank originated a majority of its loans inside the AA.
- The bank has exhibited outstanding responsiveness to community development needs in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The bank's average quarterly LTD ratio since the last examination is 85.74 percent. The average of similarly situated banks during the same period is 88.63 percent with quarterly averages ranging from a high of 95.07 percent to a low of 78.06 percent. The bank's LTD ratio over this period fluctuated between a high of 93.48 percent and a low of 76.68 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 majority of the bank's loans are inside its AA.

The bank originated and purchased 75 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Commercial Loans										
2017-2019	15	75	5	25	20	14,821	70	6,292	30	21,113

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

Description of Institution

Solera National Bank (SNB) is a federally chartered financial institution headquartered in Lakewood, Colorado. SNB is a single state institution with \$282 million in total assets as of December 31, 2019. The bank is wholly owned by Solera National Bancorp, Inc, a one-bank holding company, and does not have any other affiliates. The holding company, also located in Lakewood, Colorado has an asset size of \$40.5 million as of year-end 2019. Neither the bank, nor the holding company have engaged in any merger/acquisition activities during the evaluation period.

SNB's rating area is in central Colorado. It is a single AA consisting of the six contiguous counties of: Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson. The bank maintains one branch and one non-deposit taking ATM in the AA. There are no deposit taking ATMs located outside of the bank's branch locations.

As of December 31, 2019, the bank's net loans represented 75 percent of total assets. The bank does not have any foreign deposits. The loan portfolio is primarily comprised of commercial loans at \$170 million or 79 percent of the loan portfolio. Commercial loans include commercial real estate totaling \$129.8 million, commercial and industrial loans at \$22.3 million, and construction, land development, and other land at \$17.9 million. The remainder of the loan portfolio consists of legacy consumer revolving home equity lines of credit, first mortgages, and a student loan pool at \$45.6 million. The bank maintains a satisfactory capital position with tier one capital totaling \$41.6 million equating to a tier one leverage ratio of 14.21 percent.

Prior to the evaluation period the bank shifted its lending strategy away from consumer lending to commercial lending which now makes up a substantial portion of its loan originations. The bank is heavily focused on targeting small- to mid-sized businesses across the Denver Metro area, coupled with offering self-directed IRA deposit products nation-wide.

SNB received a 'Satisfactory' rating on its previous CRA examination dated March 14, 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. Because the highest number and the highest dollar volume of loans were concentrated in commercial loans, we selected this portfolio as our primary product. This coincides with discussions with CRA Officer Jamie Gentry, in which she indicated the bank no longer originates consumer or mortgage loans, and only originates commercial loans. Agriculture loans have never been part of the bank's strategy.

Solera Bank Loan Originations from January 1, 2017 to December 31, 2019		
Loan Type	% of total by Number	% of total by Dollar
Commercial	100	100
Consumer	0	0
Mortgage	0	0
Agriculture	0	0
Total	100	100

The evaluation period for the Community Development Test included community development activity from January 1, 2017 through December 31, 2019. The Community Development Test included a review of the bank's community development lending, service, and investment activities during the evaluation period.

With an evaluation period end date of December 31, 2019, any qualified activities performed in response to the COVID-19 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 AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (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: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The bank’s geographic distribution to low-and-moderate income census tracts is excellent.
- The borrower distribution reflects an excellent penetration of commercial loans to small businesses in the bank’s AA.
- The bank demonstrates outstanding responsiveness through community development activities.

Description of Institution’s Operations in Colorado

SNB’s operations in the State of Colorado in recent years have focused on commercial lending. The bank maintains one branch and one non-deposit taking ATM in Lakewood, Colorado. SNB ranks 27th in its AA for total deposit market share with 0.23 percent of deposits totaling \$202 million. The institution faces heavy competition in the area with 65 other institutions in the market including Wells Fargo Bank, N.A., U.S. Bank National Association, Bank of America, National Association, Bank of the West, JPMorgan Chase Bank, N.A., and FirstBank.

We reviewed five recent community contacts as part of our evaluation. The recent contacts for the Denver-Aurora-Lakewood MSA indicated the overall economy is thriving. The greater Denver Metro area and the State of Colorado has had substantial economic contribution from the Arapahoe County and Douglas County region. Job growth is outpacing net migration and small businesses are doing well in the Denver, CO area. The largest need for small business lending in Colorado is in the “start-up” community. Housing costs are continuing to rise throughout Colorado both in terms of owner occupied and rental units and there has been a high demand for down payment assistance. General banking and credit needs are affordable housing for single and multi-families and financing for building developers. The overall perception of financial institutions in the area is favorable. Local community banks are involved in community events and are doing a good job of lending in the community and meeting credit needs.

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.

Denver MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver Metropolitan Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	8.4	24.3	32.4	33.6	1.3
Population by Geography	2,649,187	8.9	24.4	32.7	34.0	0.1
Housing Units by Geography	1,072,923	8.5	23.8	34.2	33.6	0.0
Owner-Occupied Units by Geography	640,084	4.7	18.9	33.9	42.5	0.0
Occupied Rental Units by Geography	379,476	14.3	31.8	34.7	19.1	0.0
Vacant Units by Geography	53,363	11.9	25.8	33.5	28.7	0.0
Businesses by Geography	352,781	6.6	18.2	32.0	42.9	0.3
Farms by Geography	6,500	7.9	18.6	31.0	42.0	0.5
Family Distribution by Income Level	643,475	21.4	17.5	20.4	40.7	0.0
Household Distribution by Income Level	1,019,560	23.5	16.6	18.2	41.8	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,726
			Median Gross Rent			\$1,072
			Families Below Poverty Level			8.1%
<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 for SNB's one AA in the state of Colorado. There were no limited scope reviews performed. Please see Appendix A for details.

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Denver MSA AA is excellent.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

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

Our review of commercial loan originations found an overall excellent geographic distribution to low-and-moderate income census tracts in the Denver MSA AA. Lending to low income census tracts significantly outperformed census demographic and aggregate banking industry comparators. Lending to moderate income census tracts was in line with census demographic and aggregate banking industry comparators.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent 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 Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small businesses.

Our review of commercial loan originations found an excellent distribution of bank loans to small businesses in the Denver MSA AA. Lending in the AA was in line with the percent of businesses in the area with revenues under \$1 million and they are above average at 90 percent versus 48.3 percent for the aggregate with their peers.

Responses to Complaints

SNB did not have any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified donations, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a positive effect on the bank's rating in the state. SNB originated six CD loans totaling \$11.8 million or 28.4 percent of capital as of December 31, 2019. In addition, the bank originated two additional loans outside of the AA, that would benefit the state of Colorado, and therefore the AA for \$5 million or an additional 12 percent of capital. Of these loans, 84 percent went to LMI housing, 10 percent went to fund the economic development and environmental expenses in an LMI area, and six percent went to fund the revitalization/stabilization of a business in an LMI area. The bank made qualified donations totaling \$5,000 during the same period that benefited organizations providing services to LMI individuals and geographies. In addition, the bank facilitated several qualified community development services through participation in board meetings in a financial advisor capacity.

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:	01/01/17 to 12/31/19	
Bank Products Reviewed:	Lending Test – Commercial lending Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Colorado		
Denver MSA	Full Scope	The AA includes the Counties of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson

Appendix B: Summary of MMSA and State Ratings

RATINGS	SOLERA NATIONAL BANK
Overall Bank:	Lending Test Rating
Solera National Bank	Outstanding
State:	
Colorado	Outstanding

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
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	
Denver MSA	20	18,611	100.0	80,833	6.6	15.0	8.0	18.2	20.0	18.8	32.0	25.0	30.5	42.9	40.0	42.3	0.3	0.0	0.4	
Total	20	18,611	100.0	80,833	6.6	15.0	8.0	18.2	20.0	18.8	32.0	25.0	30.5	42.9	40.0	42.3	0.3	0.0	0.4	

*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	
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		
Denver MSA	20	18,611	100.0	80,833	89.9	90.0	48.3	3.5	10.0	6.5	0.00		
Total	20	18,611	100.0	80,833	89.9	90.0	48.3	3.5	10.0	6.5	0.00		

*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%*