



PUBLIC DISCLOSURE

May 20, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Fleming
Charter Number 11571

201 N. Logan
Fleming, CO 80728

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 **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- First National Bank of Fleming's (FNB) loan to deposit ratio is more than reasonable given the bank's size, financial condition and market competition.
- FNB originates a substantial majority of its loans inside the assessment area (AA).
- The bank's geographic distribution of agricultural and consumer loans is reasonable.
- The borrower distribution reflects reasonable penetration of agricultural and consumer loans to borrowers of different income levels in the bank's AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit (LTD) ratio is more than reasonable.

Since the prior CRA examination dated May 8, 2015, the bank's average quarterly LTD ratio was 91 percent and ranged from a low of 77 percent to a high of 99 percent. The LTD ratio varies throughout the year due to seasonal fluctuations in the loan portfolio. For comparison, the average quarterly LTD ratio for similarly situated banks was 76 percent. Similarly situated banks are banks which have similar asset sizes or banks with similar primary products operating within Colorado.

Institution	Average Quarterly LTD Ratio	Total Assets \$(000's)
FNB	90%	23,872
Bank A	78%	246,085
Bank B	70%	179,646
Bank C	80%	108,143
Average LTD	76%	

Lending in Assessment Area

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

FNB originated and purchased 100 percent (by number and dollar) of total sampled 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agricultural	12	100	0	0	12	\$1,520,685	100	0	100	\$1,520,685
Consumer	8	100	0	0	8	\$60,197	100	0	100	\$60,197
Total	20	100	0	0	20	\$1,580,882	100	0	100	\$1,580,882

Description of Institution

FNB is a \$22 million national bank located in Fleming, Colorado. FNB is a single state institution and does not have any related organizations or operating subsidiaries. The bank is wholly owned by Fleming Community Agency, Inc., a one-bank holding company also headquartered in Fleming, Colorado. There has been no merger or acquisition activity during the evaluation period.

Fleming is located in northeastern Colorado in Logan County approximately 20 miles east of Sterling, Colorado. FNB operates a single full-service branch with a drive-up facility; the bank does not have any ATMs.

FNB's rating area consists of a single assessment area (AA) made up of the three contiguous counties of Logan, Phillips, and Sedgewick in northeastern Colorado. The AA contains nine census tracts (CT)—eight middle-income CTs and one moderate-income CT. Phillips County was designated as underserved and Sedgewick County was designated as underserved and distressed due to population loss in each of the three years we reviewed.

Agriculture and farmland loans are the bank's primary products by number and dollar volume. Together these loans comprise 44 percent by number and 77 percent by dollar volume of all loans originated during the review period. Consumer loans also represent a significant number of loans originated during the review period, comprising 31 percent of the total number of loans originated, and are considered a primary product of the bank. These loans consist primarily of auto loan originations.

There are no legal or financial impediments to the bank's ability to meet the credit needs of the assessment area. FNB received a "Satisfactory" rating at the last CRA exam dated May 18, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB under the Small Bank examination procedures. The Small Bank procedures include a lending test, which evaluates the bank's record of meeting the credit needs of the AA through its lending activities. The lending test included an evaluation of the bank's primary lending products—agricultural and consumer loans—from January 1, 2016, through December 31, 2018. We evaluated performance using the 2010 U.S. Census data for loans originated in 2016 and the American Community Survey (ACS) U.S. Census data for loans originated in 2017-2018.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on its performance in its single non-MSA AA. More weight in the rating was given to the agricultural loan products as they represent a larger percentage of the total loan volume by number and a significantly larger portion by dollar volume.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Colorado

CRA rating for the State of Colorado: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- First National Bank of Fleming's (FNB) loan to deposit ratio is more than reasonable given the bank's size, financial condition and market competition.
- FNB originates a substantial majority of its loans inside the assessment area (AA).
- The bank's geographic distribution of agricultural and consumer loans is reasonable.
- The borrower distribution reflects reasonable penetration of agricultural and consumer loans to borrowers of different income levels in the bank's AA.

Description of Institution's Operations in Colorado

FNB's operations in the State of Colorado are focused primarily in agricultural lending and serve the single AA counties of Logan, Phillips, and Sedgewick. The population of the AA totals 28,664 as of 2017. The bank operates a single branch in Fleming, CO that offers a traditional line of lending products.

The bank ranks 8th in deposit market share in the assessment area holding 3.03 percent of deposits inside the market as of June 30, 2018. The bank holds no deposits from outside its AA. Though the bank does not have any direct competitors in the city of Fleming, CO, major competitors in the AA include First Pioneer National Bank, Bank of Colorado, and Equitable Savings and Loan Association.

We contacted a representative of the community as part of our evaluation. The community contact stated that cattle-based agriculture is the primary local economic driver in the area. With a significant decline in cattle prices since the last evaluation, the economy has suffered but it appears to be improving recently. The community's largest general banking needs are agriculture and farmland lending. The representative also indicated that local financial institutions are adequately meeting the credit needs of the community.

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

Assessment Area: Colorado Non-MSA AA 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	11.1	88.9	0.0	0.0
Population by Geography	29,530	0.0	10.5	89.5	0.0	0.0
Housing Units by Geography	12,450	0.0	12.4	87.6	0.0	0.0
Owner-Occupied Units by Geography	7,662	0.0	7.7	92.3	0.0	0.0
Occupied Rental Units by Geography	3,358	0.0	24.1	75.9	0.0	0.0
Vacant Units by Geography	1,430	0.0	10.7	89.3	0.0	0.0
Businesses by Geography	2,183	0.0	18.4	81.6	0.0	0.0
Farms by Geography	515	0.0	2.1	97.9	0.0	0.0
Family Distribution by Income Level	7,423	22.6	21.5	20.4	35.6	0.0
Household Distribution by Income Level	11,020	26.8	20.1	18.6	34.5	0.0
Median Family Income Non-MSAs - GA		\$57,817	Median Housing Value			\$114,539
			Median Gross Rent			\$570
			Families Below Poverty Level			9.2%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area

Assessment Area: Colorado Non-MSA AA 2015 ACS Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	11.1	88.9	0.0	0.0
Population by Geography	28,664	0.0	26.2	73.8	0.0	0.0
Housing Units by Geography	12,175	0.0	26.5	73.5	0.0	0.0
Owner-Occupied Units by Geography	7,178	0.0	25.4	74.6	0.0	0.0
Occupied Rental Units by Geography	3,450	0.0	30.8	69.2	0.0	0.0
Vacant Units by Geography	1,547	0.0	22.0	78.0	0.0	0.0
Businesses by Geography	2,239	0.0	22.9	77.1	0.0	0.0
Farms by Geography	475	0.0	8.0	92.0	0.0	0.0
Family Distribution by Income Level	6,801	22.9	20.0	21.9	35.2	0.0
Household Distribution by Income Level	10,628	27.9	17.7	18.6	35.8	0.0
Median Family Income Non-MSAs - GA		\$60,701	Median Housing Value			\$122,822
			Median Gross Rent			\$660
			Families Below Poverty Level			11.4%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Colorado

A full-scope review was performed for the FNB's single non-MSA AA in the state of Colorado as it was the only AA available to evaluate. There were no limited scope reviews performed. More weight was given to the agricultural loan sample as the loans represented a significantly higher percentage by dollar volume of the overall sample. Please refer to appendix A for additional details.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

Small Loans to Farms

Refer to Table S 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 farms.

Our review of loans to small farms found a reasonable geographic distribution of loans in the AA. The AA consists of eight middle income CTs and one moderate income CT. The bank's lending performance is in line with the geographic makeup of the area with its lending primarily focused in middle-income census tracts. Demographic comparators reflect similar concentrations in middle income CT lending and limited lending to the moderate income CTs. The moderate income CTs are located near the city of Sterling, CO area with limited agricultural lending opportunities. Though the bank underperformed demographic comparators in 2016, the overall performance during the review is reasonable given its performance in the 2017-2018 period and the overall performance for the review period. Overall lending statistics were within a reasonable range of demographic comparators and the banking industry as a whole.

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 loans found poor geographic distribution of loans to moderate-income consumer borrowers in the AA. Lending to moderate-income consumer borrowers was limited in both the 2016 and 2017-2018 periods and fell below demographic comparators for the area. The bank's performance is explained by the location of the bank's single branch, which is 20 miles from the moderate income CT located in Sterling, CO. A review of the bank's deposit base showed only 5 percent of its deposits come from the Sterling area. The bank also does not offer online banking, limiting its deposit base and lending clientele to those willing to go to the branch or transact by mail. FNB continues to advertise by radio and in print to the moderate-income area and faces heavy competition from banks located in Sterling.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Farms

Refer to Table T 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 small loans to farms.

Our review of loans to small farms found an excellent distribution of loans to small farms in the AA. Our review found all but one of the 40 loans reviewed was made to a small farm. The only exception was a loan where revenue information was not collected in the underwriting process.

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 loans found a reasonable distribution of loans to low- and moderate-income borrowers in the AA. Lending to moderate-income borrowers lagged in 2016, but lending was in line with demographic comparators for low-income borrowers in 2016. Lending to low- and moderate-income borrowers exceeded demographic comparators for the 2017-2018 period. The combined period reflected lending within a reasonable range of demographic household statistics. Income information was not available for five percent of our sample because the bank chose not to collect the borrower's income information.

Responses to Complaints

The bank did not received any CRA related complaints during 2016-2018 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:	(01/01/2016 to 12/31/2018)	
Bank Products Reviewed:	Small farm and consumer loans	
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
Colorado		
Colorado Non-MSA AA	Full-scope	<i>Additional weight was given to agricultural loan products based on the dollar volume of lending which totaled 77 percent during the review period</i>

Appendix B: Summary of MMSA and State Ratings

RATINGS	First National Bank of Fleming
Overall Bank:	Lending Test Rating
First National Bank of Fleming	Satisfactory
MMSA or State:	
Colorado	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- 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 S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Colorado Non-MSA AA 2016	20	1,990	32.9	417	0.0	0.0	0.0	2.1	0.0	1.2	97.9	100	98.8	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	1,990	32.9	417	0.0	0.0	0.0	2.1	0.0	1.2	97.9	100	98.8	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Colorado Non-MSA AA 2017-18	20	2,762	24.2	496	0.0	0.0	0.0	8.0	5.0	7.5	92.0	95.0	92.5	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	2,762	24.2	496	0.0	0.0	0.0	8.0	5.0	7.5	92.0	95.0	92.5	0.0	0.0	0.0	0.0	0.0	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Colorado Non-MSA AA 2016	20	1,990	32.9	417	97.5	95.0	70.7	1.9	0.0	0.6	5.0
Total	20	1,990	32.9	417	97.5	95.0	70.7	1.9	0.0	0.6	5.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Colorado Non-MSA AA 2017-2018	20	2,762	24.2	496	96.2	100	65.1	2.5	0.0	1.3	0.0
Total	20	2,762	24.2	496	96.2	100	65.1	2.5	0.0	1.3	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA 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													2016	
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 AA 2016	20	206	44.4	0.0	0.0	12.7	0.0	87.3	100	0.0	0.0	0.0	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data.
Due to rounding, totals may not equal 100.0*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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 AA 2017-2018	20	214	31.9	0.0	0.0	27.2	5.0	72.8	95.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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													2016	
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 AA 2016	20	206	44.4	26.8	25.0	20.1	10.0	18.6	35.0	34.5	25.0	0.0	5.0	
Total	20	206	44.4	26.8	25.0	20.1	10.0	18.6	35.0	34.5	25.0	0.0	5.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 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													2017-18	
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 AA 2017-2018	20	214	31.9	27.9	30.0	17.7	20.0	18.6	20.0	35.8	25.0	0.0	5.0	
Total	20	214	31.9	27.9	30.0	17.7	20.0	18.6	20.0	35.8	25.0	0.0	5.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.
Due to rounding, totals may not equal 100.0*