



## **PUBLIC DISCLOSURE**

May 20, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Pioneer National Bank  
Charter Number 8752

145 West Fourth Street  
Wray, CO 80758

Office of the Comptroller of the Currency

Denver Field Office  
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 **Outstanding**.

**The lending test is rated: Outstanding**

**The community development test is rated: Outstanding**

The major factors that support this rating include:

- First Pioneer National Bank's (FPNB) average loan-to-deposit (LTD) ratio is reasonable.
- FPNB originated a substantial majority of loans within the assessment area (AA).
- FPNB exhibits an excellent distribution of loans to farms of different sizes.
- FPNB's community development (CD) activities demonstrate excellent responsiveness to CD 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. We evaluated the bank's quarterly average LTD ratio for the 16 quarters since the prior CRA examination. During this period, the bank's LTD ratio averaged 72 percent. This ratio ranged from a quarterly low of 60 percent to a quarterly high of 79 percent. The bank's average LTD is in line with similarly situated institutions. For the purpose of this evaluation, we compared six similarly situated banks. The average LTD ratio among these institutions was 76 percent, ranging from a quarterly low of 61 percent to a quarterly high of 85 percent. 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 AA.

FPNB originated and purchased 88 percent of total sampled loans inside the bank's AAs during the evaluation period. By dollar volume, the bank originated and purchased 94 percent of total sampled loans inside the AA. We did not identify any geographical gaps in lending dispersion. 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agricultural Loans	35	87.5	5	12.5	40	3,399,456	93.9	222,234	6.1	3,621,690
Total	35	87.5	5	12.5	40	3,399,456	93.9	222,234	6.1	3,621,690

## Description of Institution

FPNB is a full service, single-state financial institution headquartered in Wray, Colorado. As of December 31, 2018, FPNB had total assets of \$179 million and tier 1 capital of \$25 million. FPNB is wholly owned by First Pioneer Bank Corporation (FPBC), a two bank holding company located in Wray, Colorado with consolidated assets of \$287 million as of December 31, 2018. FPBC also owns Farmer's State Bank of Brush located in Brush, Colorado. There have been no significant changes in FPNB's corporate structure, including merger or acquisition activities, since the prior CRA examination.

FPNB operates within a single AA comprised of Yuma and Phillips counties. Both of these counties are designated as underserved communities. FPNB operates two full service branch locations and two automated teller machines located in Wray and Holyoke, Colorado. Both locations also offer drive-up services. Each location offers a full range of products and services. As of June 30, 2018, FPNB's deposit share in the AA totaled \$151 million, ranking second out of nine depository institutions operating within the AA. FPNB has not closed or opened any offices since the prior CRA examination.

The bank offers a full range of consumer, commercial, and agricultural banking products and services. Additionally, the bank offers online and mobile banking services. These services include funds transfer, bill pay, statement review, and mobile deposit. FPNB participates (and is the state's leading lender) in the Colorado Agricultural Development Authority (CADA) Beginning Farmer Loan Program. This program provides funding to first-time farmers for the purchase of agricultural land and equipment at below market rates. Agriculture is a primary driver in the local economy and participation in this program promotes job development and population retention within rural and underserved communities.

As of December 31, 2018, net loans and leases totaled \$111 million or 62 percent of total assets. The loan portfolio is primarily comprised of \$87 million in agricultural-related loans, \$13 million in real estate loans, \$5 million in consumer loans, and \$3 million in commercial/industrial loans. As a percent of the total portfolio, these volumes equate to 76, 54, 5, and 3 percent, respectively. As a percent of tier 1 capital, these portfolios equate to 329, 231, 20, and 12 percent, respectively.

The bank's business strategy is consistent with the geography and economy within which it serves. FPNB serves community credit needs through a wide array of product offerings, including smaller dollar consumer loans; however, the bank specializes in providing financing to farms and ranches. This specialization is well-suited to the local economy, which is largely agriculturally driven.

FPNB received a "Satisfactory" rating at the previous CRA examination dated March 23, 2015. There are no known 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**

We evaluated FPNB 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 its AA through its lending activities. Evaluating community development activities is optional under the Small Bank procedures; and at management's request, the OCC reviewed the bank's CD lending, qualified investments, and services.

The lending test included an evaluation of the bank's primary product, agricultural loans, from January 1, 2016, through December 31, 2018, (lending evaluation period). 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. For the CD test, we evaluated the bank's qualified CD activities from April 1, 2015, through December 31, 2018.

### **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**

A bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Given the institution operates within a single AA located in Colorado, our overall conclusions were entirely reliant on the Colorado assessment results.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## State Rating

### State of Colorado

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

#### The Lending Test is rated: Outstanding

The major factors that support this rating include:

- FPNB originated a substantial majority of loans within the AA.
- FPNB exhibits an excellent distribution of loans to farms of different sizes.
- FPNB's CD activities demonstrate excellent responsiveness to CD needs in the AA.

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

FPNB is a full service, single-state financial institution headquartered in Wray, Colorado. FPNB operates within a single AA comprised of Yuma and Phillips counties. FPNB operates two full service branch locations and two automated teller machines located in Wray and Holyoke, Colorado. Both locations also offer drive-up services. Each location offers a full range of products and services. As of June 30, 2018, FPNB's deposit share in the AA totaled \$151 million, ranking second out of nine depository institutions operating within the AA. FPNB has not closed or opened any offices since the prior CRA examination.

The bank offers a full range of consumer, commercial, and agricultural banking products and services. Additionally, the bank offers online and mobile banking services. These services include funds transfer, bill pay, statement review, and mobile deposit. FPNB participates (and is the state's leading lender) in the CADA Beginning Farmer Loan Program. This program provides funding to first-time farmers for the purchase of agricultural land and equipment property at below market rates. Agriculture is a primary driver in the local economy and participation in this program promotes job development and population retention within rural and underserved communities.

As of December 31, 2018, net loans and leases totaled \$111 million or 62 percent of total assets. The loan portfolio is primarily comprised of \$87 million in agricultural-related loans, \$13 million in real estate loans, \$5 million in consumer loans, and \$3 million in commercial/industrial loans. As a percent of the total portfolio, these volumes equate to 76, 54, 5, and 3 percent, respectively. As a percent of tier 1 capital, these portfolios equate to 329, 231, 20, and 12 percent, respectively.

The bank's business strategy is consistent with the geography and economy within which it serves. FPNB serves community credit needs through a wide array of product offerings, including smaller dollar consumer loans; however, the bank specializes in providing financing to farms and ranches. This specialization is well-suited to the local economy, which is largely agriculturally driven. As a part of this evaluation, examiners use community contacts to assess the credit needs and opportunities in the AA. Community contacts in the AA noted primary credit needs in critical infrastructure such as hospitals, child care facilities, and school improvements. The contacts stated the financial institutions in the area are very involved and are meeting the needs of the community.

## Yuma and Phillips County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,556	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,377	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,635	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,941	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	801	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,463	0.0	0.0	100.0	0.0	0.0
Farms by Geography	469	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,426	22.5	19.2	21.9	36.4	0.0
Household Distribution by Income Level	5,576	25.1	19.2	20.3	35.3	0.0
Median Family Income Non-MSAs - CO		\$60,701	Median Housing Value			\$135,229
			Median Gross Rent			\$637
			Families Below Poverty Level			9.4%

*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

We performed a full-scope review for the bank's only AA – Yuma and Phillips County. Please reference the table in Appendix A for additional information on the AA.

### LENDING TEST

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

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

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

A geographic analysis would not provide meaningful results as there are no low- or moderate- income Census Tracts within this AA.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and 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.

#### Information as of the 2010 U.S. Census Data, Loans Originated in 2016

The distribution of small farm loans originated in 2016 reflects excellent penetration to farms of different sizes. The bank originated 90 percent by number and 81 percent by dollar volume to small farms with gross annual revenues of less than \$1 million. These volumes far exceed aggregate industry information, which reflects the volume of loans to small farms by other lenders within the AA at 56 percent. These volumes are in line with demographic reports, which reflect 96 percent of farms in the AA as small farms. We placed greater reliance on the aggregate industry information as it provides an indication of market demand. We believe this provides a more meaningful basis for analysis given the high volume of very small producers reporting some portion of farm income in the AA, but may not be of size to require debt or specific agricultural financing to fund the operation.

#### Information as of the 2015 ACS U.S. Census Data, Loans Originated from 2017-2018

The distribution of small farm loans originated in 2017-2018 reflects excellent penetration to farms of different sizes. The bank originated 90 percent by number and 86 percent by dollar volume to small farms with gross annual revenues of less than \$1 million. These volumes far exceed aggregate industry information, which reflects the volume of loans to small farms by other lenders within the AA at 50 percent. These volumes are in line with demographic reports, which reflect 96 percent of farms in the AA as small farms. Again we placed greater reliance on the aggregate industry information as it provides an indication of market demand. We believe this provides a more meaningful basis for analysis given the high volume of very small producers reporting some portion of farm income in the AA, but may not be of size to require debt or specific agricultural financing to fund the operation.

### **Qualified Investments and CD Services (Optional)**

FPNB's performance under the CD test is rated Outstanding. CD loans and qualified investments during the evaluation period totaled \$5.1 million. This represents over 20 percent of tier 1 capital. Additionally, FPNB performed CD services for 12 organizations totaling an excess of 1,000 hours in aggregate bank-wide service hours. CD services included, but were not limited to, serving on multiple boards and committees relating to local school districts, the Chamber of Commerce, youth financial education programs, a community development trust, and economic development.

FPNB provided the AA with 17 CD loans totaling \$4.8 million. The loans funded the purchase of real estate/farm equipment for first time farmers, funded improvements/equipment purchases at two local hospitals, and funded capital purchases/improvements for local school districts. These loans helped to promote economic development by financing small farms with revenues under \$1 million, helped to revitalize/stabilize underserved nonmetropolitan geographies, and provided funding to community service organizations providing services to low- and moderate-income individuals.

FPNB purchased two qualified investments totaling \$301 thousand inside the AA. The investments funded local school district bonds. FPNB also provided financial/banking literacy education materials to local schools at a cost of approximately \$2 thousand.

## **Responses to Complaints**

Neither the Office of the Comptroller of the Currency nor the bank received any complaints about the bank's CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	4/1/2015-12/31/2018	
<b>Bank Products Reviewed:</b>	Small farm Community development loans, qualified investments, and services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Colorado</b>		
Yuma & Phillips AA	Full-scope	Whole counties of Yuma & Phillips

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>	<b>First Pioneer National Bank</b>
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
First Pioneer National Bank	Outstanding
<b>MMSA or State:</b>	
Colorado	Outstanding

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table 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.

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>										<b>2016</b>	
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
	20	2,155,086	100.0	316	96.3	90.0	56.3	2.1	10.0	1.6	0.0
<b>Total</b>	<b>20</b>	<b>2,155,086</b>	<b>100.0</b>	<b>316</b>	<b>96.3</b>	<b>90.0</b>	<b>56.3</b>	<b>2.1</b>	<b>10.0</b>	<b>1.6</b>	<b>0.0</b>
<i>Source: 2016 D&amp;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</i>											

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>										<b>2017-2018</b>	
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
	20	1,893,064	100.0	390	96.1	90.0	50.3	2.0	5.0	2.0	5.0
<b>Total</b>	<b>20</b>	<b>1,893,064</b>	<b>100.0</b>	<b>390</b>	<b>96.1</b>	<b>90.0</b>	<b>50.3</b>	<b>2.0</b>	<b>5.0</b>	<b>2.0</b>	<b>5.0</b>

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