



## **PUBLIC DISCLOSURE**

September 11, 2023

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank of Fleming  
Charter Number: 11571

201 N Logan Ave  
Fleming, CO 80728

Office of the Comptroller of the Currency

Denver Office  
1050 17th Street  
Suite 1500  
Denver, CO 80265-1050

Note: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Satisfactory**.

The lending test is rated: **Satisfactory**.

The major factors that support this rating include:

- The First National Bank of Fleming (FNB, or bank) demonstrated a loan-to-deposit ratio that is reasonable given the bank’s size, financial condition, and market competition.
- FNB originated a substantial majority of its loans inside the assessment area (AA).
- The geographic distribution of small farm and small business loans is reasonable considering the nature of the AA and the competitive landscape.
- The borrower distribution of small farm and small business loans is excellent.

## Loan-to-Deposit Ratio

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

Between 2019 and 2021, FNB’s average quarterly LTD ratio was 78.6 percent, and ranged from a low of 64.9 percent to a high of 99.0 percent. In comparison, the average quarterly LTD ratio for comparable banks was 75.2 percent, with a range between 52.7 percent and 102.3 percent. Comparable banks are community banks which share similar characteristics to FNB and operate in the state of Colorado. However, it is worth noting that FNB is a particularly small community bank, and it was difficult to identify truly comparable institutions. Those selected were either small community banks operating in rural areas of Colorado, including the bank’s AA, or somewhat larger community banks that were direct competitors in the bank’s AA.

## Lending in Assessment Area

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

Based on a representative loan sample, the bank originated and purchased 100 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.

<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		
	#	%	#	%		\$	%	\$	%	
Small Business	23	100	0	0	23	2,090	100	0	0	2,090
Small Farm	23	100	0	0	23	3,296	100	0	0	3,296
<b>Total</b>	<b>46</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>46</b>	<b>5,386</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>5,386</b>

## Description of Institution

FNB is a \$27.9 million national bank located in Fleming, Colorado<sup>1</sup>. FNB is a single-state institution that is wholly owned by Fleming Community Agency, Inc., a one-bank holding company headquartered in Fleming, Colorado. There has been no merger or acquisition activity impacting the bank during the evaluation period. The bank has no affiliates or operating subsidiaries. FNB offers traditional loan and deposit products and services. FNB operates a single full-service banking location with a drive-up facility offering typical business hours Monday through Friday. The bank does not have any ATMs, though bank clients do have access to nationwide ATM networks for cash withdrawal needs.

Fleming is located in northeastern Colorado in Logan County, which is approximately 20 miles east of Sterling, Colorado. FNB's rating area consists of a single AA made up of three contiguous counties in northeastern Colorado, and includes Logan, Phillips, and Sedgwick Counties. The AA contains nine census tracts (CTs) – eight are middle-income tracts and one is a moderate-income tract. During the evaluation period, two CTs in Phillips County were considered underserved due to the rural and remote nature of the tracts. In addition, one CT in Sedgwick County was considered underserved, as well as distressed due to population loss during the period.

As of December 31, 2021, the bank's total loans were \$16.4 million, or 58.6 percent of total assets. The loan portfolio was comprised of farmland loans (40.6 percent of loans), loans to finance agricultural production (36.8 percent), commercial real estate loans (7.5 percent), other commercial loans (6.6 percent), residential real estate loans (3.5 percent), construction and development loans (2.8 percent) and consumer loans (2.2 percent). Tier 1 capital was \$2.9 million, for a tier 1 leverage ratio of 10.3 percent.

During the evaluation period, business loans and agriculture-related loans (including farmland loans) were the bank's primary products. Business loans represented approximately 43.6 percent of loan originations by number of loans, and 27.2 percent of originations by dollar volume. Agricultural loans represented approximately 35.1 percent of loan originations by number of loans, and 65.5 percent of originations by dollar volume. The bank's business lending activity increased significantly during the evaluation period due to the pandemic environment in 2020 and 2021, as the bank made a significant volume of loans through the Small Business Administration's (SBA) Paycheck Protection Program (PPP). During the evaluation period, the bank made a total of 100 PPP loans, or 61.0 percent of business loans by number; PPP lending totaled \$1.5 million, or 30.0 percent of business loans by dollar volume. These loans helped stabilize the local economy during the initial phases of the COVID-19 pandemic. The bank made a significantly smaller volume of consumer loans (primarily auto secured) and retail mortgage loans (second lien) during the evaluation period, which were not included in the lending distribution analysis.

There are no legal or financial impediments to the bank's ability to meet the credit needs of the AA. FNB received a "Satisfactory" rating at the last CRA exam dated May 20, 2019.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated FNB under the Small Bank examination procedures. The procedures include a lending test which evaluates the bank's record of meeting the credit needs of the AA through its lending

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<sup>1</sup> Based on financial data as of year-end 2021.

activities. The lending test included an evaluation of the bank's primary lending products – business and agricultural loans – from January 1, 2019, through December 31, 2021. The evaluation excluded lending activities in 2022 as peer data was not available as of the time of the evaluation.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. Because FNB operates a single location in one AA, that AA was selected for full-scope review. Refer to appendix A, Scope of Examination, for AA details.

### **Ratings**

The bank's overall rating is typically a blend of the state ratings, and where applicable, multistate ratings. However, FNB's overall rating in this case mirrors the state rating since the bank has only one AA.

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's 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 Consumer Financial Protection Bureau, 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:

- The geographic distribution of small farm and small business loans is reasonable considering the nature of the AA and the competitive landscape.
- The borrower distribution of small farm and small business loans is excellent.

### Description of Institution's Operations in Colorado

As of June 30, 2021, FNB had \$23.6 million in deposits in this AA. The AA is served by ten FDIC-insured depository institutions operating 14 banking locations. FNB ranked 8<sup>th</sup> with 2.8 percent deposit market share. The top three banks and their deposit market share include Bank of Colorado (38.2 percent), Points West Community Bank (15.5 percent), and Wells Fargo Bank (10.6 percent). Based on business loan market share data, there is a larger volume of lenders operating in the AA. For lenders required to report small business loan data, 45 lenders made one or more loans in 2021 within the Fleming AA.

The table below provides a summary of demographic information applicable to the Fleming AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2019-2021 Fleming AA						
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	3,009	0.0	23.3	76.7	0.0	0.0
Farms by Geography	541	0.0	9.8	90.2	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 - CO		\$60,701	Median Housing Value			\$122,822
			Median Gross Rent			\$660
			Families Below Poverty Level			11.4%

Source: 2015 ACS and 2021 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.

According to Moody’s Analytics, economic drivers in the state of Colorado include the high-tech sector, energy and resources, and Colorado’s status as a tourist destination. Payroll growth has recently lost momentum, but employment continues to trend up. Recent growth has been led by leisure/hospitality and professional/ technical services. Economic strengths include a diversified economy with numerous high-value-added industries, strong in-migration and rapidly growing prime-age population, a well-educated workforce, and above-average per capita income. Weaknesses include exposure to the volatile energy industry, low housing affordability, and a high level of consumer debt per capita. Housing affordability has been declining statewide, consistent with national trends. Key industries in Colorado include professional and business services (16.9 percent), government (15.6 percent), education and health services (12.3 percent), and leisure and hospitality services (11.8 percent).

Based on data from the U.S. Bureau of Labor and Statistics, the counties in the Fleming AA demonstrated lower unemployment rates during the pandemic compared to the state and nation. The national unemployment rate peaked in April 2020 (at 14.7 percent). In Colorado, the unemployment rate peaked in May 2020 (at 11.7 percent), compared to Logan, Phillips, and Sedgwick Counties, where the unemployment rates peaked in June 2020 (at 7 percent, 4.9 percent, and 5.5 percent, respectively). The table below reflects annual average unemployment rates in the U.S., Colorado, and the individual counties within the Fleming AA.

<b>Unemployment Rates – Annual Averages</b>			
<b>Geography</b>	<b>2019 (%)</b>	<b>2020 (%)</b>	<b>2021 (%)</b>
United States	3.7	8.1	5.4
Colorado	2.7	6.8	5.5
Logan County	2.3	4.4	4.7
Phillips County	1.5	2.5	3.1
Sedgwick County	1.9	3.3	4.0

*Source: Evaluation Period: 1/1/2019-12/31/2021, BLS Unemployment Data*

While national and statewide unemployment rates spiked in 2020 and then trended down significantly through the rest of 2020 and 2021, the counties in the Fleming AA spiked more modestly in 2020 but remained somewhat elevated, resulting in average unemployment rates in 2021 that exceeded their average rates in 2020. However, unemployment rates in the Fleming AA were still lower overall than the state of Colorado and the U.S. overall for each year in the evaluation period.

This evaluation considered comments from a representative of a local economic development organization during the evaluation period. The community contact noted that the main economic drivers in Logan County are agriculture, manufacturing, fabrication, metalworking, and food processing. The contact described the economy as relatively strong, with some challenges that occurred during the pandemic. Key employers in the area include Sterling Correctional Facility, RE-1 Valley School District, Banner Health, Walmart, and Northeastern Junior College. Local challenges currently include the low availability of housing in the area. However, affordability remains good, especially compared to other parts of the state. Significant credit needs include agriculture, farmland, and commercial lending, and the contact stated that local financial institutions are doing a good job addressing local credit needs and are

committed to the community. The contact also mentioned available sponsorship opportunities at his organization which fund an entrepreneurship program in the local area.

## **Scope of Evaluation in Colorado**

A full-scope review was performed for FNB's single non-MSA AA within the state of Colorado. Each primary loan product was given equal weight in the analysis. Refer to Appendix A for additional details related to scope.

## **Lending Test**

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

## **Conclusions for Area Receiving a Full-Scope Review**

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

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

The bank exhibits a reasonable geographic distribution of loans in the state. Of note, the bank's AA does not include any low-income tracts, and the sole moderate-income tract is located within the town of Sterling, CO which is about 20 miles away from Fleming. In addition, three of the eight middle-income tracts in the AA (37.5 percent) were designated as underserved and/or distressed.

### ***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.

The geographic distribution of small business loans in the AA is reasonable. Based on a sample, the bank did not make any loans to businesses in the moderate-income CT. Therefore, the bank's performance appears very poor compared to the percentage of businesses in moderate-income CTs and the associated peer-aggregate performance. However, 39.1 percent of the bank's business loan sample was made in middle-income tracts that were designated as underserved and/or distressed. In addition, Sterling is a larger town offering more banking competition than Fleming. FNB does not have a branch in Sterling, hindering their ability to effectively compete. These factors help support overall reasonable performance.

### ***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.

The geographic distribution of small farm loans in the AA is reasonable. Based on the reviewed sample, the bank did not make any loans to farms in the moderate-income CT. Therefore, the bank's performance appears very poor compared to the percentage of farms in moderate-income CTs and the associated peer-aggregate performance. However, 34.8 percent of the sampled farm loans were made in middle-income tracts that were designated as underserved and/or distressed. Agricultural lending opportunities are more



limited in this tract, and FNB is geographically less competitive given their single location in Fleming. These factors help support overall reasonable performance.

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

The bank exhibits an excellent distribution of loans to businesses and farms of different sizes, given the product lines offered by the bank.

#### ***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 small loans to businesses.

The distribution of loans to small businesses in the AA is excellent. The bank's percentage of loans to small businesses exceeds the percentage of small businesses in the AA, and significantly exceeds the associated peer-aggregate lending performance for reporting institutions.

#### ***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.

The distribution of loans to small farms in the AA is excellent. The bank's percentage of loans to small farms is consistent with the percentage of small farms in the AA, and significantly exceeds the associated peer-aggregate lending performance for reporting institutions.

### **Responses to Complaints**

The bank reported no CRA-related complaints 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>	01/01/2019 through 12/31/2021	
<b>Bank Products Reviewed:</b>	Small Business and Small Farm Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.	N/A	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>MMSA(s)</b>		
N/A		
<b>States</b>		
Colorado – Fleming AA	Full-Scope	Counties: Logan, Phillips, Sedgwick

## Appendix B: Summary State Ratings

RATINGS: The First National Bank of Fleming	
Overall Bank:	Lending Test Rating:
<b>FNB Fleming</b>	<b>Satisfactory</b>
State:	
<b>Colorado</b>	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.



- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

State of Colorado:

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2019-2021		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$ (000s)	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Fleming AA	23	2,090	100	0.0	0.0	0.0	23.3	0.0	23.6	76.7	100	76.4	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>23</b>	<b>2,090</b>	<b>100</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.3</b>	<b>0.0</b>	<b>23.6</b>	<b>76.7</b>	<b>100</b>	<b>76.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 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												2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Fleming AA	23	2,090	100	679	84.1	91.3	40.1	3.4	8.7	12.5	0.0		
<b>Total</b>	<b>23</b>	<b>2,090</b>	<b>100</b>	<b>679</b>	<b>84.1</b>	<b>91.3</b>	<b>40.1</b>	<b>3.4</b>	<b>8.7</b>	<b>12.5</b>	<b>0.0</b>		

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

<b>Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																<b>2019-2021</b>		
Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$ (000s)	% of Total	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Fleming AA	23	3,296	100.0	0.0	0.0	0.0	9.8	0.0	8.0	90.2	100.0	92.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>23</b>	<b>3,296</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.8</b>	<b>0.0</b>	<b>8.0</b>	<b>90.2</b>	<b>100.0</b>	<b>92.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2019-2021</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Fleming AA	23	3,296	100.0	659	96.5	95.7	38.1	2.2	4.3	1.3	0.0		
<b>Total</b>	<b>23</b>	<b>3,296</b>	<b>100.0</b>	<b>659</b>	<b>96.5</b>	<b>95.7</b>	<b>38.1</b>	<b>2.2</b>	<b>4.3</b>	<b>1.3</b>	<b>0.0</b>		

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