



PUBLIC DISCLOSURE

August 14, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Solera National Bank
Charter 24737

319 S. Sheridan Boulevard
Lakewood, CO 80226

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 Lending Test rating is based on Solera National Bank's (SNB) record of performance in meeting the credit needs of its assessment area (AA) during the evaluation period through lending activities.
 - The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and business strategy.
 - SNB originated a majority of loans outside its AA.
 - The geographic distribution of small business loans across geographies of different income levels is reasonable.
 - The bank's borrower distribution reflects a reasonable distribution of lending to businesses of different sizes within the AA.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is more than reasonable (considering seasonal variations and accounting for lending related activities) given the institution's size, financial condition, and AA credit needs. Examiners considered the average, net LTD ratio's reasonableness in light of information from performance context including, as applicable, the institution's capacity to lend, the capacity of other similarly situated institutions to lend in the AA, and demographic and economic factors present in the AA, and the lending opportunities available in the AA.

Examiners analyzed the bank's quarterly average, net LTD ratio for the eight quarters since the prior Community Reinvestment Act (CRA) examination through December 31, 2021. SNB's average LTD ratio for the evaluation period was 88.1 percent. During the review period the bank's LTD ratio ranged from a high of 97.0 percent as of March 31, 2021, to a low of 78.6 percent as of December 31, 2021. For purposes of comparison, examiners selected five similarly situated banks generally operating in the same geographic region. The combined average quarterly LTD ratio for these institutions over the same period was 75.9 percent. Their average quarterly LTD ratios ranged from a high of 176.2 percent to a low of 38.1 percent. SNB's average LTD ratio is higher than that of comparable institutions.

Lending in Assessment Area

A majority of the bank's loans are outside its assessment area.

The bank originated and purchased 30.0 percent of the number and 26.1 percent of the dollar volume of its total loans inside the bank's AAs during the evaluation period based on a representative sample of small business loans. Although performance does not meet the standard for satisfactory performance, SNB's efforts are not unreasonable given the bank's business strategy and performance context considerations.

The bank's target market is the Denver metro area which is in-line with their designated AA. However, SNB offers a unique deposit account with a nationwide customer base. This fact coupled with a high level of Paycheck Protection Program (PPP) lending outside of the bank's market area impacted SNB's lending patterns within the AA. Specifically, examiners determined that most PPP loans originated outside the AA were from businesses looking for a bank with the ability to process PPP applications when their local financial institution was unable to facilitate a PPP request due to unprecedented demand. Management did not expand the AA just so the majority of the bank's lending occurred within in the AA as SNB cannot reasonably service a nationwide AA given the institutions size and resources. Refer to the *Description of Institution* section for additional detail on the unique performance context affecting SNB's lending within their designated AA.

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. This performance factor had a neutral impact on the overall assessment of the bank's geographic distribution of loans.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	6	30.0	14	70.0	20	479	26.1	1,359	73.9	1,838
Total	6	30.0	14	70.0	100	479	26.1	1,359	73.9	1,838

Description of Institution

Solera National Bank is a nationally chartered bank headquartered in Lakewood, CO along the front range of the Rocky Mountains. The bank is entirely owned by Solera National Bancorp, Inc, a one-bank holding company. SNB is a single state institution, maintains one location, and has a single non-deposit taking Automatic Teller Machine (ATM). The bank has not opened or closed any offices during the review period. SNB has one assessment area (AA), consisting of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson counties within the Denver metropolitan statistical area (MSA). The bank has not undergone any merger or acquisition activities during the evaluation period and does not have any subsidiaries or affiliates.

SNB offers unique products and services to consumers and businesses with a lending strategy focused on commercial lending for small- to mid-sized businesses within the Denver, CO area. The bank offers a niche deposit product, checkbook control self-directed retirement accounts, which very few financial institutions offer across the nation. These accounts allow for interest-free deposits that enable the owner to invest in alternative assets. Although SNB's primary lending strategy is focused on the Denver, CO area, their deposit product attracts a nationwide deposit base resulting in a geographically diverse customer base which extends beyond the bank's targeted lending area.

SNB is a \$994.9 million institution as of December 31, 2022 and has experienced significant growth since 2019. Examiners evaluated the institution based on total assets through the evaluation period which totaled \$652.5 million as of December 31, 2021. Refer to the *Evaluation Period/Products Evaluated* section for additional detail. SNB's loan portfolio during the evaluation period totaled \$468.6 million and was primarily comprised of commercial loans. The bank's Tier 1 Capital totaled \$58.3

million as of December 31, 2021. Refer to the *Loan Portfolio by Major Product Type* table below for additional detail.

During the evaluation period SNB originated more than 1,208 loans under the Small Business Administration's Paycheck Protection Program, which amounted to approximately \$82.8 million. These loans helped stabilize the local economy during the initial phases of the COVID-19 Pandemic, and primarily benefitted small businesses. To respond to the extraordinary PPP loan demand, SNB created an online PPP application portal which allowed businesses on a national scale to submit PPP requests through the bank. SNB did not limit PPP application requests to a specific geography as its philosophy was to consider all requests. A large portion of PPP loan requests were outside of the bank's AA as SNB was able to originate PPP loans in the event a business' local financial institution was unable to facilitate the request due to resource limitations.

Solera Bank, N.A.		
Loan Portfolio by Major Product Type		
As of December 31, 2021		
Loan Type	(\$000's)	% of Portfolio
Commercial Real Estate	192,749	41.1
Commercial & Industrial	141,838	30.3
1-4 Family Residential	49,669	10.6
Multifamily Real Estate	34,824	7.4
Construction	38,075	8.1
Farmland	0	0.0
Consumer/Other	11,470	2.5
Total	468,625	100.0

SNB received an "Outstanding" rating at its previous Office of the Comptroller of the Currency (OCC) evaluation, date July 27, 2020, based on Federal Financial Institutions Examination Council (FFIEC) Intermediate-Small Institution CRA Examination Procedures. There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test included loan originations from January 01, 2020, through December 31, 2021. The evaluation period was shortened from a 3-year to a 2-year evaluation due to lack of available comparable small business loan data for 2022 at the time of the review. Examiners determined the primary loan product for the Lending Test by determining the highest concentration of loans originated by number and dollar volume during the evaluation period. Examiner review determined commercial lending represented the highest concentration by both number and dollar amount for the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state is selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area are combined and evaluated as a single AA. 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 the state of Colorado (CO). The state rating is based on performance in the bank’s one AA. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted when arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Colorado

CRA rating for the State of Colorado¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution reflects a reasonable distribution of business lending across geographies of different income levels within the bank's AA when considering the impact of lending in low-moderate income tracts.
- The borrower distribution reflects a reasonable distribution of lending to businesses of different sizes within the bank's AA.

Description of Institution's Operations in Colorado

Solera National Bank is a nationally chartered bank headquartered in Lakewood, Colorado, which is within the Denver-Aurora-Lakewood MSA (Denver MSA). SNB operates one full-service banking location and a non-deposit-taking ATM in Lakewood, Colorado. Lakewood is located directly west of Denver and is part of the greater Denver MSA, which includes the counties of: Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park. SNB designated one AA within the Denver MSA which includes the whole counties of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson. The AA consists of 476 census tracts (CTs): 42 low-income, 121 moderate-income, 144 middle-income, 163 upper-income. The AA meets regulatory requirements and does not arbitrarily exclude LMI geographies.

Economic Data

According to the February 2023 Moody's analytics report, the Denver economy is slated to slow, but remain ahead of the region and overall nation. The primary drivers of the Denver economy are the high-technology, finance, and logistics industries. The report identifies strengths in the economy of a skilled workforce, high employment diversity, strong in-migration, and population growth, as well as concentration of dynamic, knowledge-based industries. Denver also faces weaknesses, primarily due to the high cost of living as well as the high housing costs, which has resulted in a lack of affordable housing. The finance and high-technology sectors faced difficulties following the collapse of a prominent lender to tech startups, which had a large presence in the Denver area. The failure resulted in a pullback of venture capital deals and has also led to more stringent lending practices for other financial institutions. Top employers within Denver include HealthOne, UCHealth, Lockheed Martin, United Airlines, and the Children's Hospital Colorado. Unemployment levels in Denver continues to trend downward from a high during the COVID-19 pandemic. The 2019 rate was 2.5 percent, 2020 was 7.1 percent, 2021 of 5.5 percent, 2022 was 3.6 percent, and 2023 is projected to have a 3.2 percent unemployment rate.

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

Competition

The financial services market is highly competitive. According to the June 30, 2021, deposit market share report, Solera National Bank captured 0.38 percent of the total market share. This places Solera 22nd out of the 68 depository institutions. Primary banking competitors include Wells Fargo, US Bank, JP Morgan Chase, FirstBank, and KeyBank, which represent a combined deposit market share of 71.4 percent.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	8.4	24.3	32.4	33.6	1.3
Population by Geography	2,649,187	8.9	24.4	32.7	34.0	0.1
Housing Units by Geography	1,072,923	8.5	23.8	34.2	33.6	0.0
Owner-Occupied Units by Geography	640,084	4.7	18.9	33.9	42.5	0.0
Occupied Rental Units by Geography	379,476	14.3	31.8	34.7	19.1	0.0
Vacant Units by Geography	53,363	11.9	25.8	33.5	28.7	0.0
Businesses by Geography	501,914	6.9	19.0	31.9	41.9	0.3
Farms by Geography	8,758	7.9	19.6	31.1	41.0	0.3
Family Distribution by Income Level	643,475	21.4	17.5	20.4	40.7	0.0
Household Distribution by Income Level	1,019,560	23.5	16.6	18.2	41.8	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Housing Value			\$280,726
			Median Gross Rent			\$1,072
			Families Below Poverty Level			8.1%

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.

Table B – Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Denver-Aurora-Lakewood, CO MSA Median Family Income (19740)				
2020 (\$100,000)	<\$50,000	\$50,000 to <\$80,000	\$80,000 to <\$120,000	≥\$120,000
2021 (\$104,800)	<\$52,400	\$52,400 to <\$83,840	\$83,840 to <\$125,760	≥\$125,760

Source: FFIEC

Community Contacts

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners used an existing community contact conducted during the review period from a local small business development center which aims to provide small businesses with training, consulting, and financial resources. The contact noted that economic conditions within Colorado are generally faring better than national averages but stated that businesses located within the Denver metro area are struggling because of the COVID-19 pandemic. The contact believes banks could better serve the Denver metro area by participating in community services such as financial educational and technical assistance for small businesses, and support from banks during PPP loan rollouts. The contact believes that financial institutions generally do well in meeting the credit needs of small business within the Denver area. Specifically, the contact mentioned small businesses were best supported by regional and local banks and found larger institutions with a national footprint with the most opportunity for improvement in regard to supporting small businesses.

Scope of Evaluation in Colorado

A full-scope review was performed for SNB's single Denver MSA AA in Colorado. Refer to Appendix A for additional Details.

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 Denver MSA AA is adequate.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

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

The geographic distribution of business loans in the Denver MSA is reasonable overall. Based on a sample of loans, the bank originated 5.0 percent of small business loans within low-income census tracts, which is slightly below but in line with the range of demographic and peer aggregate comparators. Performance is slightly stronger in the moderate-income tracts; the bank's percentage of loans to businesses in moderate-income tracts slightly exceeds the range of demographic and peer aggregate comparators. Examiners placed more weight on performance in moderate-income tracts as there are significantly more businesses located in these geographies.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

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

The origination of PPP loans to meet the credit needs of small businesses during the COVID-19 pandemic did not require collection of Gross Annual Revenue Data (GAR). The sample of loans used for the borrower distribution included a significant number of PPP loans as PPP comprised a significant portion of the bank's loans originated in their AA. As a result, the percentage of bank loans compared to AA demographic and aggregate percentages was not meaningful. As a result, examiners also analyzed the bank's distribution using loan size as a proxy for revenue of the borrower.

Table R shows the bank's lending to small businesses of 5.0 percent was below the small business demographic and aggregate lending statistics of the AA at 92.4 percent and 47.6 percent respectively. This reflects very poor distribution. The table below, using the proxy analysis described previously, shows that 100.0 percent of the PPP loans sampled were in amounts less than \$1 million. This represents a reasonable distribution within the AA. Additionally, 66.7 percent of loans by number were made in amounts less than or equal to \$100,000 reflecting responsiveness to the lending needs of small businesses. Examiners concluded the overall distribution of loans to small businesses in the AA is reasonable.

Borrower Distribution of PPP Loans to Businesses by Loan Size in Denver MSA AA				
Loan Size	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	12	66.7	423,323	24.4
\$100,001-\$250,000	4	22.2	493,473	28.4
\$250,001-\$500,000	2	11.1	820,853	47.2
\$501,000-\$750,000	0	0.0	0	0.0
Total	18	100.0	1737,649	100.0

Responses to Complaints

Solera National Bank did not receive any complaints regarding the bank's CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits adequate responsiveness to community development (CD) needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. Performance related to community development activities had a neutral effect on the bank's rating in the state.

SNB made approximately 1,208 PPP loans during 2020 and 2021, totaling \$82.8 million. This accounted for a substantial majority of the total number of loans made during the period, representing 81.4 percent of total originations or purchases by number. While not all PPP originations qualify for CD activities, examiners considered 109 PPP loans within the broader statewide or regional area totaling approximately \$9.1 million. The significant majority of the loans originated by SNB that qualified for community development consisted of 2nd round PPP loans to borrowers located in the State of Colorado. These loans generally qualify as disaster assistance under the OCC's June 2020 CRA rule, which was in effect for part of the bank's evaluation period. Total qualified CD lending amounted to approximately 15.6 percent of Tier 1 Capital. SNB's efforts in originating PPP loans nationwide took time and resources away from other opportunities and should be recognized, despite not qualifying for CD loans. The bank did not submit qualifying CD investments or services during the evaluation period for examiner consideration.

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:	01/01/2020 to 12/31/2021	
Bank Products Reviewed:	Lending Test: Small Business Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Colorado		
Denver MSA	Full Scope	Full Counties: Adams, Arapahoe, Broomfield, Denver, Douglas, Jefferson

Appendix B: Summary of MMSA and State Ratings

RATINGS SOLERA NATIONAL BANK	
Overall Bank:	Lending Test Rating
Solera National Bank	Satisfactory
State: Colorado	
Denver MSA	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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2020-21		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Denver MSA	20	2,672	100	6.9	5.0	7.7	19.0	20.0	18.7	31.9	40.0	31.0	41.9	35.0	42.3	0.3	0.0	0.0
Total	20	2,672	100	6.9	5.0	7.7	19.0	20.0	18.7	31.9	40.0	31.0	41.9	35.0	42.3	0.3	0.0	0.0

Source: 2020-2021 D&B Data; 01/01/2020 - 12/31/2021 Bank 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												2020-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Denver MSA	20	2,672	100	101,584	92.4	5.0	47.6	2.4	5.0	5.2	90.0		
Total	20	2,672	100	101,584	92.4	5.0	47.6	2.4	5.0	5.2	90.0		

Source: 2020-2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0