



PUBLIC DISCLOSURE

August 19, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

San Luis Valley Federal Bank
Charter Number 701142

401 Edison Avenue
Alamosa, CO 81101

Office of the Comptroller of the Currency

Denver Field Office
1225 17th Street
Suite 450
Denver, CO 80202

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- San Luis Valley Federal Bank originated a substantial majority of its loans inside the assessment area (AA).
- SLVFB has exhibited outstanding responsiveness to community development needs in the AA.
- The bank’s geographic distribution of mortgage loans is reasonable.
- The borrower distribution reflects a reasonable penetration of mortgage loans to borrowers of different income levels in the bank’s AA.
- The bank’s loan to deposit ratio is reasonable and meets the standard for satisfactory performance.

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.

Since the prior CRA examination dated June 06, 2016, the bank’s average quarterly LTD ratio was 73 percent and ranged from a high of 80 percent to a low of 69 percent. This is reasonable compared to the average LTD ratio of similarly situated banks and given local economic conditions. Similarly situated bank’s LTD ratios averaged 73 percent with a high of 89 percent and a low of 56 percent. Similarly situated banks have similar asset sizes or banks with similar primary products operating within similar geographies.

Lending in Assessment Area

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

The bank originated and purchased 95 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA level.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	19	95	1	5	20	\$1,692	87	\$250	13	\$1,942
Total	19	95	1	5	20	\$1,692	87	\$250	13	\$1,942

Description of Institution

San Luis Valley Federal Bank (SLVFB) is a federally chartered stock thrift headquartered in Alamosa, Colorado. SLVFB is a single state institution with \$281 million in total assets as of June 30, 2019. The bank is wholly owned by Colorado Mutual Bancorp and does not have any other affiliates.

SLVFB's rating area is in the San Luis Valley of southern Colorado. It is a single AA consisting of the six contiguous counties of: Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache. The bank maintains three branches in the AA, two in Alamosa, CO and one in Monte Vista, CO. There are no deposit taking ATMs located outside of the bank's branch locations.

As of June 30, 2019, the bank's net loans represent 67 percent of total assets. The loan portfolio is primarily comprised of real estate loans totaling \$173 million. Commercial loans (non real estate) make up \$8 million, individual loans represent \$4.9 million and other loans and leases total \$4.6 million. The bank maintains a strong capital position with tier 1 capital totaling \$46.9 million and a tier 1 leverage capital ratio of 17.23 percent.

As represented by the bank's loan portfolio breakdown, real estate is the primary lending focus of the institution, with residential 1-4 family real estate comprising 83 percent of total real estate lending. These loans include first and second mortgages, construction loans, and home equity lines of credit. Lending strategies and product offerings are consistent throughout the AA and between branches.

SLVFB received an "Outstanding" rating on its previous CRA examination dated June 6, 2016. There were no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period included loan originations from January 1, 2016 through December 31, 2018. We determined the primary loan product by establishing the concentration of loans originated by number and dollar volume for each loan type. A summary of the loan originations is included in the table below. Based on the concentration of the highest number and highest dollar volume of loans concentrated in mortgage lending, we selected mortgage loans as our primary product. Mortgages include first and second mortgages and Home Equity Lines of Credit on 1-4 family homes.

San Luis Valley Federal Bank Loan Originations from January 1, 2016 to December 31, 2018				
Loan Type	Volume by Number	Volume by Dollar \$(000's)	% of total by Number	% of total by Dollar
Commercial	140	38,007	8.7	29.3
Agricultural	5	1,306	0.3	1.0
Consumer	620	7,890	38.6	6.1
Mortgage	841	82,510	52.4	63.6
Total	1,606	129,713	100	100

Ratings

The bank's overall rating is based on its performance in its single non-Metropolitan Statistical Area (MSA) AA. The state rating is based on performance in the bank's AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Colorado

CRA rating for the State of Colorado¹: Outstanding

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's geographic distribution of mortgage loans is reasonable.
- The borrower distribution reflects reasonable penetration of mortgage loans to borrowers of different income levels.
- SLVFB demonstrates outstanding responsiveness through community development loans and investments.

Description of Institution's Operations in Colorado

SLVFBs operations in the State of Colorado are focused primarily in mortgage lending in the San Luis Valley counties of Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache. The bank offers a traditional line of banking and lending products from its three branch locations. SLVFB ranks second in its AA for total deposit market share with 23.71 percent of total deposits totaling \$220.7 million. The institution faces heavy competition in the area from competitors such as Alamosa State bank, First Southwest Bank, Community Banks of Colorado (NBH), Del Norte Bank, Rio Grande Savings and Loan Association, Sunflower Bank, and Frontier Bank.

We contacted a community representative as part of our evaluation. The contact indicated the local economy is primarily driven by agriculture and tourism and is seasonal in nature. Economic conditions are fair and housing prices have seen a moderate increase driven by a shortage of supply. The contact indicated the banking industry is doing a good job lending in the area and has a willingness to fund small business and consumer loans. The banking industry is meeting the credit needs of the community and providing meaningful support to the community in the form of donations.

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

Rural Colorado AA

Table A – Demographic Information of the Assessment Area

Assessment Area: Colorado Rural 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.00	71.4	28.6	0.00	0.00
Population by Geography	46,027	0.00	78.8	21.2	0.00	0.00
Housing Units by Geography	25,103	0.00	75.6	24.4	0.00	0.00
Owner-Occupied Units by Geography	12,189	0.00	77.9	22.1	0.00	0.00
Occupied Rental Units by Geography	4,938	0.00	87.7	12.3	0.00	0.00
Vacant Units by Geography	7,976	0.00	64.7	35.3	0.00	0.00
Businesses by Geography	3,297	0.00	77.2	22.8	0.00	0.00
Farms by Geography	417	0.00	52.3	47.7	0.00	0.00
Family Distribution by Income Level	11,359	31.2	21.7	20.6	26.5	0.00
Household Distribution by Income Level	17,127	36.4	18.6	18.3	26.7	0.00
Median Family Income Non-MSAs - GA	\$57,817	Median Housing Value				\$139,943
		Median Gross Rent				\$542
		Families Below Poverty Level				21%

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

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

Table A – Demographic Information of the Assessment Area

Assessment Area: Colorado Rural 2015 ACS Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.00	57.1	42.9	0.00	0.00
Population by Geography	46,815	0.00	54.9	45.1	0.00	0.00
Housing Units by Geography	25,414	0.00	53.1	46.9	0.00	0.00
Owner-Occupied Units by Geography	12,049	0.00	53.2	46.8	0.00	0.00
Occupied Rental Units by Geography	5,871	0.00	56.1	43.9	0.00	0.00
Vacant Units by Geography	7,494	0.00	50.6	49.4	0.00	0.00
Businesses by Geography	3,285	0.00	45.0	55.0	0.00	0.00
Farms by Geography	401	0.00	34.9	65.1	0.00	0.00
Family Distribution by Income Level	11,288	30.80	20.0	20.7	28.5	0.00
Household Distribution by Income Level	17,920	36.1	17.0	18.0	29.0	0.0
Median Family Income Non-MSAs - GA	\$60,701	Median Housing Value				\$142,870
		Median Gross Rent				\$602
		Families Below Poverty Level				16.3%

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

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

Scope of Evaluation in Colorado

A full-scope review was performed for SLVFB's single non-MSA AA in the state of Colorado as it was the only AA available to evaluate. There were no limited scope reviews performed. Please see Appendix A for additional details.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Our review of mortgage loan originations found a reasonable geographic distribution of loans to moderate-income census tracts in the AA. SLVFB's lending performance is in line with the geographic housing statistics of the area and out performs the industry averages represented by the aggregate figures in Table O.

Distribution of Loans by Income Level of the Borrower

Given the products offered, the bank exhibits a reasonable distribution of loans to individuals of different income levels, and businesses and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Our review of mortgage loan originations found a reasonable distribution of loans to borrowers of different income levels in the AA. Lending to moderate-income borrowers was in line with area demographic comparators and industry averages. Lending to low-income borrowers underperformed area demographics by a significant margin as seen in Table P for both the 2016 and the 2017-2018 period. In our review, we noted the low-income population has a significant portion comprised of families whose income was below the poverty level. The underperformance of low income lending is attributable to the high level of families below the poverty level in the AA and the resulting limited lending opportunities. In 2016, of the 31.2 percent of low-income borrowers, 67.3 percent were below the poverty level. In the 2017-2018 period, of the 30.8 percent of low-income families, 52.9 percent were below the poverty level.

The bank has also taken steps to provide additional products to low-income borrowers including 100 percent financing of home mortgages with an 80 percent first mortgage and a 20 percent second mortgage. They also provide a mortgage option with 89 percent financing and no mortgage insurance.

Community Development Activity

SLVFB exhibited outstanding responsiveness to the community development needs of the AA by originating community development loans and providing qualifying community development donations. Community development activities are outstanding given the bank's capacity and the need and availability of such opportunities in the bank's AA. The bank originated four community development loans during the evaluation period which totaled \$2.75 million or 5.9 percent of Tier 1 capital. Of these loans, 77 percent went to housing for low- and moderate-income (LMI) individuals, 22 percent went to economic development for a moderate-income community, and the remainder went to a school district with a majority of students receiving free or reduced cost lunches. The bank also made qualified donations totaling \$196 thousand during the same period that benefited organizations providing services to LMI individuals and geographies. Examples of qualified community development lending include:

- A \$2.1 million loan to fund an assisted living facility primarily serving Medicare recipients.
- A \$100,000 loan to a local municipality to fund the revitalization of housing in a moderate-income community.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgages, community development loans, qualified investments.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Colorado		
Colorado Rural AA	Full Scope	The AA includes the Counties of Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache.

Appendix B: Summary of MMSA and State Ratings

RATINGS	San Luis Valley Federal Bank
Overall Bank:	Lending Test Rating
San Luis Valley Federal Bank	Satisfactory
MMSA or State:	
Colorado	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Rural AA	40	4,130	2.5	642	0.0	0.0	0.0	77.9	75.0	69.0	22.1	25.0	31.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	40	4,130	2.5	642	0.0	0.0	0.0	77.9	75.0	69.0	22.1	25.0	31.0	0.0	0.0	0.0	0.0	0.0	0.0

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Colorado Rural AA	40	4,479	2.5	727	0.0	0.0	0.0	53.2	52.5	48.8	46.8	47.5	51.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	40	4,479	2.5	727	0.0	0.0	0.0	53.2	52.5	48.8	46.8	47.5	51.2	0.0	0.0	0.0	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Rural AA	40	4,130	2.5	642	31.2	5.0	5.0	21.7	22.5	17.1	20.6	25.0	21.5	26.5	47.5	31.5	0.0	0.0	24.9
Total	40	4,130	2.5	642	31.2	5.0	5.0	21.7	22.5	17.1	20.6	25.0	21.5	26.5	47.5	31.5	0.0	0.0	24.9

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Colorado Rural AA	40	4,479	2.5	727	30.8	2.5	10.6	20.0	20.0	21.6	20.7	25.0	21.6	28.5	52.5	27.8	0.0	0.0	18.4
Total	40	4,479	2.5	727	30.8	2.5	10.6	20.0	20.0	21.6	20.7	25.0	21.6	28.5	52.5	27.8	0.0	0.0	18.4

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