



HIGH PLAINS BANK
Employee Owned • Community Driven

CRA Public File - 2025



COLORADO
Office of Economic Development
& International Trade

PPP Heroes to be recognized by Governor Polis

Monday, August 30, 2021

Banks, credit unions and nonprofits honored for processing PPP loans

DENVER (August 30, 2021) – Governor Polis and the Colorado Office of Economic Development and International Trade (OEDIT) is recognizing banks, credit unions and Community Development Investment Funds (CDFIs) for their work throughout 2020 to process Paycheck Protection Program (<https://www.sba.gov/funding-programs/loans/covid-19-relief-options/paycheck-protection-program>) (PPP) loans for Colorado businesses.

“The efforts of Coloradans have allowed us to build back stronger. Our lending institutions processed 196,258 loans, providing more than \$15 billion dollars in funds with an average loan size of \$77,144, 14.31% larger than the national average,” said Governor Jared Polis. “This money saved thousands of jobs and helped power the Colorado comeback.”

The bank that did the largest number of loans was First Bank which provided 18,695 loans.

“Once we heard about the SBA’s plan for the Paycheck Protection Program, we didn’t hesitate to step in, knowing this was a lifeline for local economies and small businesses,” said Jim Reuter, CEO of FirstBank. “We set out to help as many organizations as possible, and within the first 72 hours of launching PPP, our team had several thousand applications and worked around the clock to process them all. We’re extremely proud that in the end we funded over 20,000 PPP loans, providing \$1.4 billion in economic relief.”

The Governor and Frances Padilla, District Director for the Colorado Small Business Administration, will recognize lenders during two calls on August 30 and September 13.

Padilla praised the state’s numerous lenders of all sizes for the “herculean” effort they put forward since April of 2020 in helping to save Colorado’s small businesses.

“This recognition of our state’s extensive network of lending institutions is well deserved and appreciated,” Padilla said. “Banks, credit unions, CDFIs, and mission-based lenders were the key to ensuring access to the Paycheck Protection Program and that critical aid made its way to nearly 200,000 awarded applicants. While many entities are to be commended for their tireless work over the last 18 months, our lenders were the difference in the ability for Colorado small businesses to keep their employees on payroll and ultimately to survive.”

The winners were selected by OEDIT in conjunction with the lender trade associations using SBA lender data as of July 1, 2021. The institutions being recognized were divided into seven tiers, based on Colorado Deposits or lender classifications.

Tier 1, \$5 billion or more in Colorado Deposits

First Bank
US Bank, National Association
Wells Fargo Bank, National Association

Tier 2, \$1 billion to \$4.99 billion in Colorado Deposits

Bank of Colorado
Alpine Bank
Zions Bancorporation, N.A.

Tier 3, \$300 million to \$900 million in Colorado Deposits

Timberline Bank First
Southwest Bank
The First National Bank of Las Animas

Tier 4, \$200 million to \$299 million in Colorado Deposits

Points West Community Bank
High Plains Bank
InBank
High Country Bank

Tier 5, \$100 million to \$199 million in Colorado Deposits

FMS Bank
Farmers & Stockmens Bank
The Gunnison Bank and Trust Company
Wray State Bank

Tier 6, \$50 million to \$99.99 million in Colorado Deposits

Rocky Mountain Bank & Trust
American Bank of Commerce
The Bank of Burlington

Tier 7, up to \$49.99 million Colorado Deposits

FirsTier Bank
FNB Bank
The Central Trust Bank

Nonprofit Lenders

DreamSpring
Colorado Enterprise Fund
B:Side Capital (formerly Colorado Lending Source)

All Credit Unions

Canvas CU
Premier Members CU
Security Service FCU
Partner Colorado CU

Colorado received a proportionate number of PPP loans relative to market size. Colorado has 2.3% of the nation's small businesses with fewer than 500 employees and received 1.65% of the total number of loans approved nationwide. The state seemed to have lower demand for PPP loans in 2021 compared to other states, based on our better than average economic recovery from the pandemic.

"Coloradans, by and large, received their vaccinations early which helped to propel our state's economic recovery," said Pat Meyers, Executive Director of OEDIT and the state's Chief Economic Recovery Officer. "We continue to see indicators that our state's strong economy is rebounding and with the recent FDA approval of the Pfizer vaccine, we are confident that recovery will continue its upward trajectory."



PUBLIC DISCLOSURE

April 25, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

High Plains Bank
RSSD# 247551

329 Main Avenue
Flagler, Colorado 80815

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

High Plains Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- An excellent distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's three AAs. The Northeast Colorado AA and the Boulder Metropolitan Statistical Area (MSA) AA were assessed using a full scope review. The Denver Metropolitan AA was assessed using a limited scope review. Examiners reviewed the following data:

- The bank's 18-quarter average NLTD ratio.
- A statistical sample of 158 small business loans from a universe of 719 loans originated from January 1, 2021, through December 31, 2021.
- A statistical sample of 68 home mortgage loans from a universe of 102 loans originated from January 1, 2021, through December 31, 2021.
- A statistical sample of 128 small farm loans from a universe of 348 loans originated from January 1, 2021, through December 31, 2021.

More weight was placed on the bank's small business lending performance based on the bank's strategic focus and composition of the loan portfolio. The Northeast Colorado AA and the Boulder MSA AA were weighted equally when determining the overall institution rating, given the bank's loan and deposit volume and deposit market share.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Flagler, Colorado. The bank's characteristics include:

- The bank is a wholly owned subsidiary of High Plains Banking Group, Incorporated.
- The bank has total assets of \$307.8 million (MM) as of December 31, 2021.
- The bank operates six locations in Colorado; including the bank's headquarters in Flagler, two branches in Longmont, one in Bennett, one in Keenesburg, and one in Wiggins.
- The bank operates four cash-only dispensing automated teller machines (ATMs) located in the Flagler, Wiggins, Longmont, and Bennett office locations.
- As shown in the table below, the bank's primary business focus is commercial lending.

Table 1

Composition of Loan Portfolio as of December 31, 2021		
Loan Type	\$(000)	%
Construction and Land Development	18,512	8.5
Farmland	26,712	12.2
1-4 Family Residential Real Estate	50,137	22.9
Multifamily Residential Real Estate	6,597	3.0
Non-Farm Non-Residential Real Estate	77,397	35.4
Agricultural	17,515	8.0
Commercial and Industrial	18,798	8.6
Consumer	2,493	1.1
Other	645	0.3
Gross Loans	218,806	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its February 5, 2018 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA¹

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Northeast Colorado AA and the Boulder

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment areas only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

MSA AAs (full scope review); and a brief discussion of performance in the Denver Metropolitan AA (limited scope review).

LENDING TEST

The bank's overall performance under the lending test is satisfactory based on a reasonable NLTD ratio, a majority of loans originated within the bank's AAs, an excellent geographic distribution and a reasonable borrower distribution of loans within each of the bank's full-scope review AAs. The institution's lending performance in the Denver Metropolitan AA was below the institution's performance overall; however, it did not affect the overall CRA rating for the institution.

Small farm lending was not evaluated in the Boulder MSA as the volume of loans was not sufficient to conduct a meaningful analysis.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and market share.

The bank's NLTD ratio is reasonable. The bank's NLTD ratio was above the ratios of two similarly situated banks, and comparable to two banks, with ratios that ranged from 73.4 percent to 86.2 percent.

Table 2

Comparative NLTD Ratios September 30, 2017 – December 31, 2021			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			18-Quarter Average
High Plains Bank	Flagler, Colorado	307,805	88.1
Similarly Situated Institutions			
Farmers Bank	Ault, Colorado	317,605	82.5
Stockmens Bank	Colorado Springs, Colorado	445,038	86.2
Mountain Valley Bank	Walden, Colorado	501,253	73.4
Eastern Colorado Bank	Cheyenne Wells, Colorado	574,198	79.8

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AAs.

Table 3

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Residential Loans	51	75.0	19,61	76.5	17	25.0	6,023	23.5
Total Non-HMDA Residential Related	51	75.0	19,61	76.5	17	25.0	6,023	23.5
Small Business	116	73.4	8,144	67.5	42	26.6	3,928	32.5
Total Small Business Related	116	73.4	8,144	67.5	42	26.6	3,928	32.5
Small Farm	100	78.1	5,462	65.6	28	21.9	2,861	34.4
Total Small Farm Related	100	78.1	5,462	65.6	28	21.9	2,861	34.4
TOTAL LOANS	267	75.4	33,22	72.2	87	24.6	12,81	27.8
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects an excellent distribution among the different census tracts and dispersion throughout the AAs. Performance in both the Northeast Colorado AA and the Boulder MSA AA was excellent, while lending in the Denver Metropolitan AA was below the lending performance of the full scope review AAs.

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and to businesses and farms of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes. Performance in both the Northeast Colorado AA and Boulder MSA AA was reasonable, while lending in the Denver Metropolitan AA was below the lending performance of the full-scope review AAs.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**NORTHEAST COLORADO ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NORTHEAST COLORADO
AA**

The bank's Northeast Colorado AA consists of Kit Carson, Lincoln, Morgan, Logan, and Washington Counties in their entirety, and one census tract in Weld County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The Northeast Colorado AA is comprised of five moderate-, sixteen middle-, and one upper-income census tracts.
- At the previous examination the AA was comprised of two moderate-, nineteen middle-, and one upper-income census tracts.
- The AA includes the Flagler main office located in Kit Carson County, the Wiggins Branch in Morgan County, and the new Keenesburg location in Weld County. The main office and the Wiggins Branch both include drive-through facilities and onsite cash-dispensing ATMs.
- According to the June 30, 2021, FDIC Deposit Market Share Report, the bank ranks 17th of 33 FDIC-insured institutions operating in Kit Carson, Lincoln, Morgan, Logan, Washington, and Weld Counties, with a deposit market share of 1.6 percent.
- To further augment the CRA performance evaluation, one interview was conducted with a member of the community within the bank's AA to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization focused on economic development within the AA.

Table 4

Population Change			
Assessment Area: Northeast Colorado AA			
Area	2010 Population	2015 Population	Percent Change
Northeast Colorado AA	322,244	339,488	5.4
Kit Carson County, CO	8,270	7,980	(3.5)
Lincoln County, CO	5,467	5,478	0.2
Logan County, CO	22,709	21,928	(3.4)
Morgan County, CO	28,159	28,359	0.7
Washington County, CO	4,814	4,795	(0.4)
Weld County, CO	252,825	270,948	7.2
NonMSA Colorado	687,293	688,010	0.1
Colorado	5,029,196	5,278,906	5.0
<i>Source: 2010 U.S. Census Bureau Decennial Census74221+270948 2011 - 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.</i>			

- According to the 2015 American Community Survey (ACS) five-year average, the AA's population of 74,221 residents accounts for 1.4 percent of the statewide population and 10.8 percent of the nonmetropolitan population.
- According to the 2020 U.S. Census, the main population centers in the AA include the towns of Burlington (3,172 residents), Fort Morgan (11,597 residents), Sterling (13,735) and Akron (1,757).
- The population of residents aged 65 and older in the AA account for 16.1 percent of the AA's total population, which is above both the statewide figure at 12.2 percent and the nonmetropolitan figure at 15.6 percent.

Table 5

Median Family Income Change Assessment Area: Northeast Colorado AA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Northeast Colorado AA	66,584	66,048	(0.8)
Kit Carson County, CO	60,700	52,575	(13.4)
Lincoln County, CO	59,504	55,714	(6.4)
Logan County, CO	56,810	56,216	(1.0)
Morgan County, CO	53,003	53,067	0.1
Washington County, CO	53,321	56,691	6.3
Weld County, CO	70,777	70,457	(0.5)
NonMSA Colorado	62,960	60,701	(3.6)
Colorado	76,277	74,826	(1.9)
<p><i>Source: 2006 - 2010 U.S. Census Bureau: American Community Survey 2011 - 2015 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars. All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.</i></p>			

- According to the 2015 ACS five-year average, 43.4 percent of families in the AA are LMI, which is above the statewide and nonmetropolitan figures at 38.9 percent and 39.3 percent, respectively.
- The percentage of families living below poverty in the AA, at 9.6 percent, is also above the statewide figure of 8.5 percent but below the nonmetropolitan figure of 10.0 percent. The three counties in the AA with the largest percentage of LMI families living below poverty are Kit Carson, Lincoln, and Logan at 11.8 percent, 11.3 percent, and 11.8 percent, respectively.

Table 6

Housing Cost Burden						
Assessment Area: Northeast Colorado AA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northeast Colorado AA	72.8	42.7	40.7	64.4	42.1	20.9
Kit Carson County, CO	45.1	38.6	31.4	57.1	21.4	17.6
Lincoln County, CO	64.7	37.5	40.2	48.2	30.0	17.4
Logan County, CO	77.1	29.3	42.7	56.9	24.2	16.9
Morgan County, CO	69.8	32.1	32.0	49.1	37.7	18.4
Washington County, CO	56.2	7.5	21.2	51.0	21.4	14.1
Weld County, CO	74.0	46.8	42.4	67.8	46.2	21.7
NonMSA Colorado	72.7	39.4	41.3	58.6	35.6	24.0
Colorado	79.9	51.2	46.4	65.0	43.1	21.8
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i> <i>Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability</i> <i>Strategy Note: All data is presented at the county level and some values may be different than expected for this AA which</i> <i>includes partial counties.</i>						

- According to the 2015 ACS five-year average, median gross rent in the AA at \$697 is below the statewide figure of \$1,002 and nonmetropolitan figure at \$853.
- The median housing value in the AA at \$139,038 is below the statewide figure of \$247,800 and the nonmetropolitan figure of \$217,300.
- The AA has a comparable percentage of rental units at 29.0 percent compared to the state at 31.9; however, the AA has a higher percentage of rental units than the nonmetropolitan figure of 22.1 percent.
- A community contact stated that housing stock is very limited, and that many of the homes considered affordable are being purchased by families or individuals moving out of Denver to the area. This is ultimately driving up home prices in the AA. In addition, housing stock in the AA is older (52 years), which may prevent LMI borrowers from owning versus renting due to the need to borrow at higher amounts for repairs or renovations.

Table 7

Unemployment Rates					
Assessment Area: Northeast Colorado AA					
Area	2016	2017	2018	2019	2020
Northeast Colorado AA	3.2	2.4	2.7	2.4	6.6
Kit Carson County, CO	2.0	1.6	1.9	1.6	2.8
Lincoln County, CO	2.5	1.9	2.2	2.2	4.5
Logan County, CO	2.8	2.2	2.6	2.3	4.7
Morgan County, CO	3.3	2.3	2.7	2.5	5.4
Washington County, CO	2.1	1.8	2.3	1.9	3.1
Weld County, CO	3.3	2.5	2.8	2.5	7.0
NonMSA Colorado	3.3	2.6	3.1	2.7	7.1
Colorado	3.1	2.6	3.0	2.7	7.3
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> <i>Note: All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.</i>					

- The major industries are food and agriculture; advanced manufacturing; health and wellness; energy and natural resources; and transportation and logistics.
- The largest employers are Cargill Meat Solutions Corporation, Midwest Farms, Hitchcock Inc., Sterling Medical Center, Kit Carson County Memorial Hospital, Colorado Plains Medical Center, County and City Government, and Leprino Foods.
- A community member stated it has been difficult to find laborers, specifically in the agricultural sector. Additionally, he stated that the retail and restaurant service industries are having the similar difficulties in finding and retaining employees.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN NORTHEAST COLORADO AA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA. Although some gaps in the bank's lending were identified, specifically within two of the AA's five-moderate-income census tracts, it did not impact the overall conclusion based on where these tracts are located with respect to the bank's branch locations, as well as the number of local and national financial institutions present in these areas.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's lending in the moderate-income census tracts was above the percentage of owner-occupied units in these tracts. In addition, some gaps in lending were noted; however, dispersion was considered reasonable due to competition and distance of the branch locations.

Table 8

Distribution of 2021 Residential Lending By Income Level of Geography					
Assessment Area: Northeast Colorado AA					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	7	46.7	1,253	34.4	22.1
Middle	5	33.3	1,981	54.4	73.3
Upper	3	20.0	405	11.1	4.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	15	100.0	3,639	100.0	100.0
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending in moderate-income census tracts was above the percentage of businesses in the AA. Additionally, some gaps in lending were noted; however, dispersion was considered reasonable due to competition and distance of the branch locations.

Table 9

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Colorado AA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	15	34.9	278	18.4	26.4
Middle	26	60.5	1,205	80.0	70.5
Upper	2	4.7	24	1.6	3.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	43	100.0	1,507	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

The geographic distribution of small farm lending is excellent. The bank's lending in the moderate-income census tracts was above the percentage of farms in these tracts. In addition, some gaps in lending were noted; however, dispersion was considered reasonable due to competition and distance of the branch locations.

Table 10

Distribution of 2021 Small Farm Lending By Income Level of Geography					
Assessment Area: Northeast Colorado AA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	31	41.3	1,755	46.5	16.5
Middle	41	54.7	1,989	52.7	77.8
Upper	3	4.0	27	0.7	5.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	75	100.0	3,771	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes

The bank's lending has a reasonable distribution among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank did not originate any loans to low-income borrowers, and only two loans to moderate-income borrowers during the review period. The bank's lending to moderate-income borrowers was below the demographic figure. However, performance is reasonable as the opportunity to lend to LMI borrowers is limited based on the current housing market in the area including rising home values, limited affordable housing and older housing stock.

Table 11

Distribution of 2021 Residential Lending By Borrower Income Level					
Assessment Area: Northeast Colorado AA					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	22.1
Moderate	2	13.3	137	3.8	21.3
Middle	3	20.0	742	20.4	21.0
Upper	7	46.7	2,024	55.6	35.6
Unknown	3	20.0	736	20.2	0.0
Total	15	100.0	3,639	100.0	100.0
<i>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>					

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1MM or less by number volume was comparable to the percent of small businesses in the AA. In addition, all 33 loans to small businesses were made in amounts of \$100M, which demonstrates the bank's support of small businesses that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 12

Distribution of 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Colorado AA					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	33	76.7	502	33.3	90.5
Over \$1 Million	5	11.6	856	56.8	7.4
Revenue Unknown	5	11.6	149	9.9	2.2
Total	43	100.0	1,507	100.0	100.0
By Loan Size					
\$100,000 or Less	41	95.3	838	55.6	
\$100,001 - \$250,000	1	2.3	200	13.3	
\$250,001 - \$1 Million	1	2.3	470	31.2	
Total	43	100.0	1,507	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	33	100.0	502	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	33	100.0	502	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bra dstreet Data 2011-2015 U.S. Census Burea u: America n Community Survey Note: Percenta ges may not total 100.0 percent due to rounding.					

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's lending to small farms is comparable to the percentage of small farms with revenues of \$1MM or less in the AA. In addition, the bank originated 42 of the 52 loans to small farms in the amounts of \$100M or less, which demonstrates the bank's willingness to lend to smaller farms that typically do not have the need or capacity to borrow larger dollar amounts.

Table 13

Distribution of 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Northeast Colorado AA					
	Bank Loans				Total Farms
	#	#%	\$(000)	\$%	%
By Revenue					
\$1 Million or Less	52	69.3	2,788	73.9	96.3
Over \$1 Million	6	8.0	505	13.4	3.7
Revenue Unknown	17	22.7	477	12.6	0.0
Total	75	100.0	3,771	100.0	100.0
By Loan Size					
\$100,000 or Less	62	82.7	1,231	32.6	
\$100,001 - \$250,000	10	13.3	1,685	44.7	
\$250,001 - \$500,000	3	4.0	854	22.6	
Total	75	100.0	3,771	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	42	80.8	802	28.8	
\$100,001 - \$250,000	7	13.5	1,132	40.6	
\$250,001 - \$500,000	3	5.8	854	30.6	
Total	52	100.0	2,788	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**BOULDER MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN BOULDER MSA AA

The bank's Boulder MSA AA consists of Boulder County, two census tracts in Larimer County, and five census tracts Weld County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA is comprised of 5 low-, 15 moderate-, 31 middle-, and 24 upper-income census tracts. At the previous examination the AA was comprised of 5 low-, 12 moderate-, 33 middle- and 25 upper-income census tracts.
- The bank operates two full-service branches located in Longmont. One of the locations includes a cash-dispensing ATM.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked 33 of 45 FDIC-insured depository institutions operating in Boulder, Larimer, and Weld Counties with a total deposit market share of 0.2 percent.
- An interview with a member of the community within the bank's AA was conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization focused on housing services in the AA.

Table 14

Population Change			
Assessment Area: Boulder MSA AA			
Area	2010 Population	2015 Population	Percent Change
Boulder MSA AA	847,022	899,207	6.2
Boulder County, CO	294,567	310,032	5.3
Larimer County, CO	299,630	318,227	6.2
Weld County, CO	252,825	270,948	7.2
Boulder, CO MSA	294,567	310,032	5.3
Colorado	5,029,196	5,278,906	5.0
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.</i>			

- According to the 2015 ACS five-year average, the AA's population accounts for 6.5 percent of the statewide population.

- The county seat of Boulder County is the city of Boulder, which has a population of 108,250 according to the 2020 U.S. Census. Additionally, the University of Colorado Boulder is located in this AA, with a student population of 35,897.

Table 15

Median Family Income Change Assessment Area: Boulder MSA AA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Boulder MSA AA	81,808	79,258	(3.1)
Boulder County, CO	95,675	96,926	1.3
Larimer County, CO	80,333	76,886	(4.3)
Weld County, CO	70,777	70,457	(0.5)
Boulder, CO MSA	95,675	96,926	1.3
Colorado	76,277	74,826	(1.9)
Source: 2006 - 2010 U.S. Census Bureau: American Community Survey 2011 - 2015 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars. All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.			

- According to the 2015 ACS, 37.6 percent of families in the AA are LMI, which is comparable to the 38.9 percent statewide figure.
- The percentage of families living below poverty in the AA at 6.2 percent is below the statewide figure of 8.5 percent.

Table 16

Housing Cost Burden Assessment Area: Boulder MSA AA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Boulder MSA AA	81.9	52.2	50.2	63.3	43.5	20.7
Boulder County, CO	82.9	54.3	52.3	62.5	40.5	20.5
Larimer County, CO	85.0	54.6	53.0	60.9	43.0	20.2
Weld County, CO	74.0	46.8	42.4	67.8	46.2	21.7
Boulder, CO MSA	82.9	54.3	52.3	62.5	40.5	20.5
Colorado	79.9	51.2	46.4	65.0	43.1	21.8
Cost Burden is housing cost that equals 30 percent or more of household income Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy Note: All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.						

- According to the 2015 ACS there is a higher percentage of owner-occupied units at 61.0 percent compared to rental units at 33.7 percent. The state figures for owner-occupied and rental units at 57.6 percent and 31.9 percent are below the AA's.
- The median age of housing stock in the AA at 38 years is above the statewide figure of 33 years.
- The cost burden for renters in the AA is comparable to the statewide figure. According to the U.S. Department of Housing and Urban Development Fair Market Rent (FMR) 2021 data, the Boulder, Colorado MSA, has the highest FMR for all bedroom sizes ranging from \$1,428 for a one-bedroom to \$2,721 for a four-bedroom.
- According to the Consortium Consolidated Plan for 2020-2024 for the Boulder Broomfield Regional Home Consortium, approximately 23 percent of renters in Boulder County are cost burdened and 31 percent are severely cost burdened. Additionally, 13 percent of homeowners are cost burdened, and 9 percent are severely cost burdened.
- The community member stated that affordable housing is a need in the Boulder County area, as housing prices and costs have escalated as a result of people moving to Colorado during the pandemic. They indicated that ten jurisdictions have implemented a regional housing strategy to increase the level of affordable housing stock with the collective goal of 18,000 affordable homes preserved or to be developed by 2035.

Table 17

Unemployment Rates					
Assessment Area: Boulder MSA AA					
Area	2016	2017	2018	2019	2020
Boulder MSA AA	2.8	2.3	2.7	2.3	6.5
Boulder County, CO	2.6	2.2	2.6	2.3	6.2
Larimer County, CO	2.7	2.3	2.6	2.3	6.3
Weld County, CO	3.3	2.5	2.8	2.5	7.0
Boulder, CO MSA	2.6	2.2	2.6	2.3	6.2
Colorado	3.1	2.6	3.0	2.7	7.3
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					
Note: All data is presented at the county level and some values may be different than expected for this AA which includes partial counties.					

- The major industries in the AA are Education, Healthcare, Aerospace, Bioscience, Cleantech, Information Technology/Software, Natural Products, and Outdoor Recreation.
- The five largest employers in the AA include Array BioPharma, Ball Aerospace, Battelle, Boulder Brands, and Boulder Community Health.
- The community member stated since the start of Coronavirus Disease 2019, the shutdown of businesses in the area has adversely impacted economic growth in the area and was primarily attributed to the inability to hire staff, increasing cost of labor and materials/goods, as well as the lack of affordable

space or offices. Many of the broad issues identified by the county's business community overlap with other needs of the community, such as need for more affordable childcare, housing, and access to technology.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN BOULDER MSA AA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA. While some gaps in lending were noted, particularly within several of the AA's LMI census tracts, dispersion is reasonable as the bank only operates two branches in this AA and faces significant competition presented by other area financial institutions. Small farm lending was not evaluated as the limited volume was insufficient to draw a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's lending in LMI census tracts was above the percentage of owner-occupied units in these tracts. Although some gaps in the bank's lending were identified they did not impact the conclusion due to competition.

Table 18

Distribution of 2021 Residential Lending By Income Level of Geography					
Assessment Area: Boulder MSA AA					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	\$%	
Low	1	4.3	54	0.5	2.6
Moderate	9	39.1	3,175	27.8	16.4
Middle	7	30.4	3,173	27.8	41.8
Upper	6	26.1	5,031	44.0	39.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1	0.0	
Total	23	100.0	11,434	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending to businesses located in LMI census tracts was above the total number of businesses in these tracts. Some gaps in the bank's lending were identified, however, due to competition in the AA, it did not impact the conclusion.

Table 19

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Boulder MSA AA					
Geographic Income Level	Bank Loans				Total
	#	#%	\$(000)	%	Businesses %
Low	3	5.6	137	2.3	3.7
Moderate	22	40.7	1,824	30.4	27.5
Middle	15	27.8	1,971	32.9	35.7
Upper	14	25.9	2,068	34.5	33.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	54	100.0	6,000	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. Home mortgage lending to low-income borrowers was comparable to the demographic figure. Lending to moderate-income borrowers was comparable to the demographic figure.

Table 20

Distribution of 2021 Residential Lending By Borrower Income Level Assessment					
Area: Boulder MSA AA					
Borrower Income Level	Bank Loans				Families by Family
	#	#%	\$(000)	\$%	Income %
Low	5	21.7	939	8.2	21.2
Moderate	4	17.4	1,667	14.6	16.4
Middle	2	8.7	596	5.2	19.7
Upper	12	52.2	8,231	72.0	42.8
Unknown	0	0.0	0	0.0	0.0
Total	23	100.0	11,434	100.0	100.0
Source: 2021 FFIEC Census Data					
2011-2015 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1MM or less was comparable to the total number of businesses in the area. In addition, the bank originated 26 loans in amounts of \$100,000 or less to small businesses, which demonstrates the bank's support of small businesses that may not have the repayment capacity or the need to borrow larger loan amounts.

Table 21

Distribution of 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Boulder MSA AA					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	34	63.0	3,495	58.3	93.2
Over \$1 Million	5	9.3	1,227	20.5	5.9
Revenue Unknown	15	27.8	1,277	21.3	0.9
Total	54	100.0	6,000	100.0	100.0
By Loan Size					
\$100,000 or Less	39	72.2	1,013	16.9	
\$100,001 - \$250,000	8	14.8	1,537	25.6	
\$250,001 - \$1 Million	7	13.0	3,450	57.5	
Total	54	100.0	6,000	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	26	76.5	607	17.4	
\$100,001 - \$250,000	4	11.8	863	24.7	
\$250,001 - \$1 Million	4	11.8	2,025	57.9	
Total	34	100.0	3,495	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**DENVER METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN DENVER METROPOLITAN AA

The Denver Metropolitan AA includes Adams, Arapahoe, and Denver Counties in their entirety. Refer to Appendix A for a map of the AA, as well as Appendix C for additional demographic data.

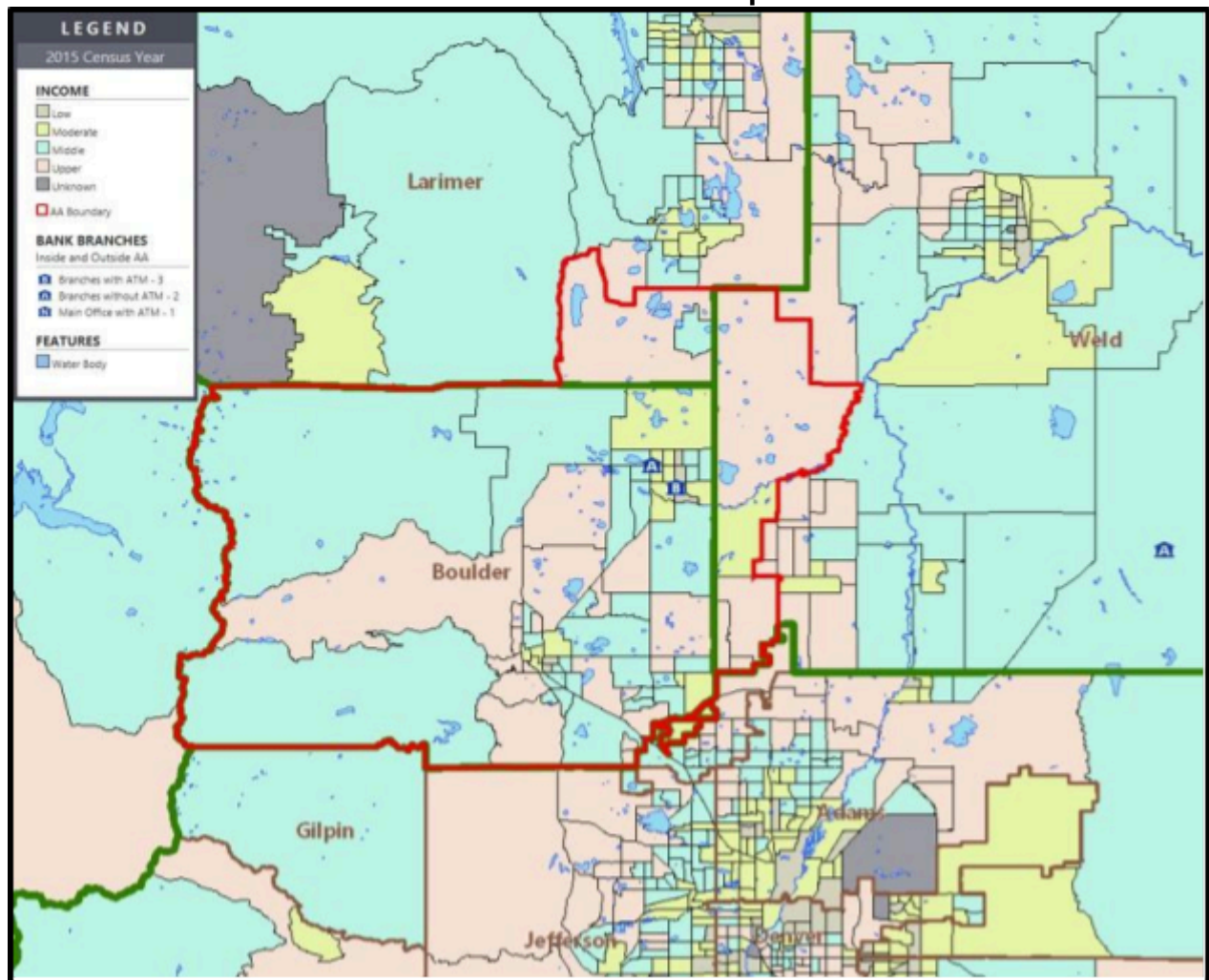
- The AA is comprised of 49 low-, 121 moderate-, 115 middle-, 100 upper-, and 3 unknown-income census tracts.
- At the previous examination, the AA was comprised of 66 low-, 110 moderate-, 123 middle-, 87 upper-, and 2 unknown-income census tracts.
- The bank operates one branch in Bennett, Colorado, with a cash-only ATM.
- According to the June 30, 2021 FDIC Market Share Report, the bank ranked 47th of 65 FDIC insured institutions in the AA with a market share of 0.1 percent.
- According to the 2015 ACS, the AA's population is 1,729,170.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN DENVER METROPOLITAN AA

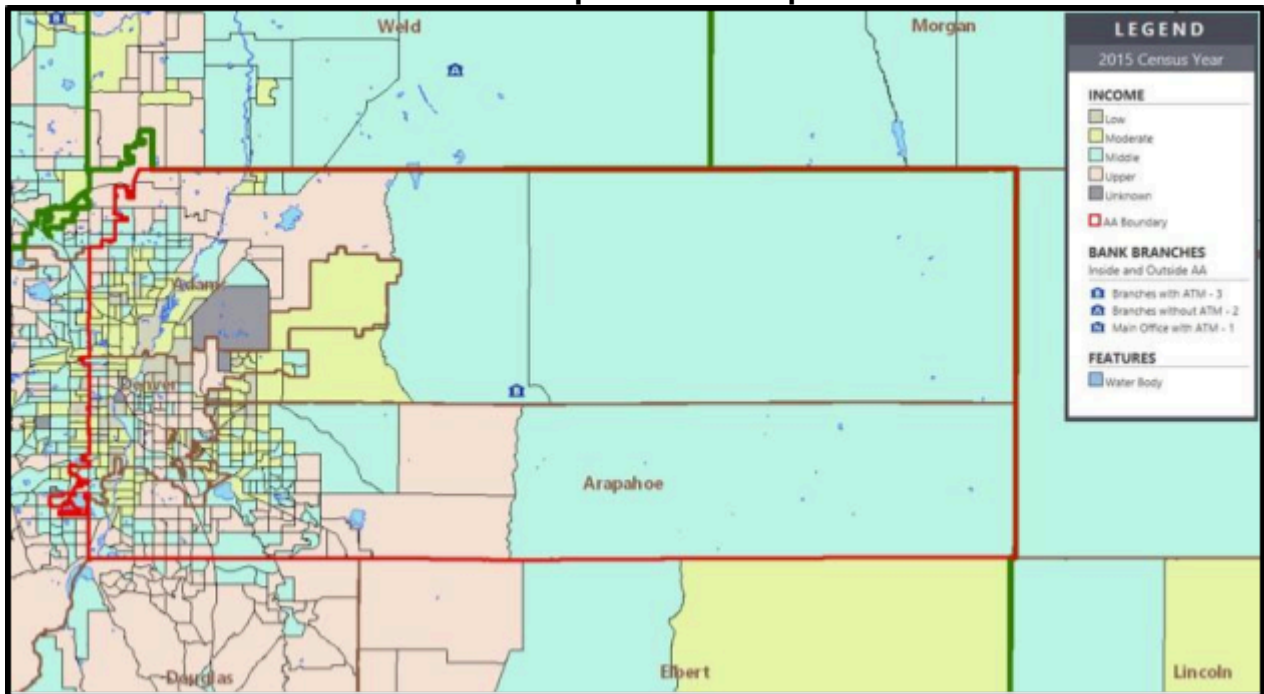
Performance in the Denver Metropolitan AA was reviewed using the limited-scope examination procedures. The bank's lending activity in the AA from January 1, 2021, to December 31, 2021, included 13 home mortgage loans, 19 small business loans and 17 small farm loans. The lending performance in the area is below the lending performance for the institution; however, it does not change the overall rating.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

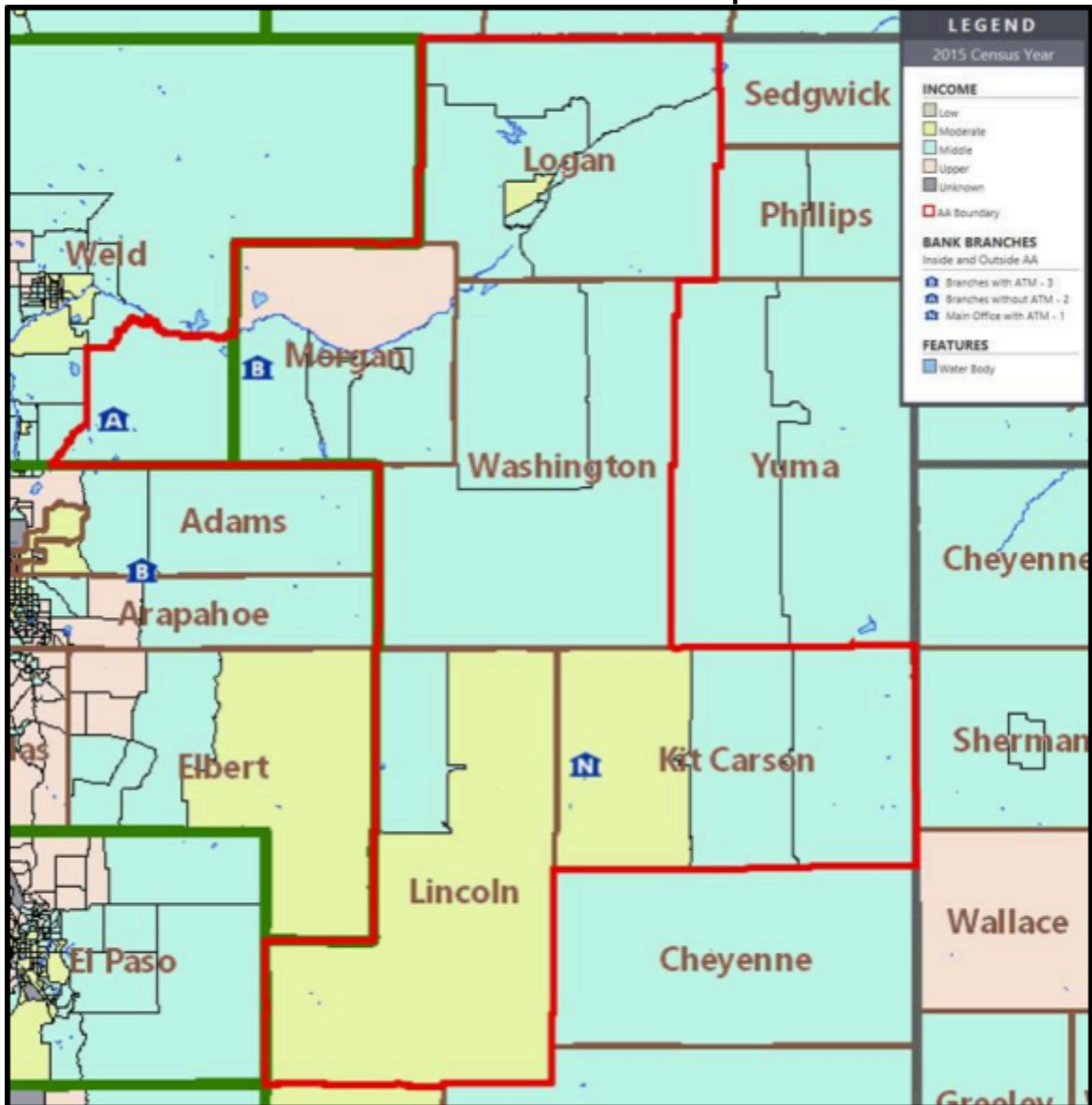
Boulder MSA AA Map



Denver Metropolitan AA Map



Northeast Colorado AA Map



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2021 Boulder MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	6.7	3,847	4.7	958	24.9	17,407	21.2
Moderate	15	20.0	14,348	17.4	1,555	10.8	13,493	16.4
Middle	31	41.3	34,256	41.6	1,812	5.3	16,197	19.7
Upper	24	32.0	29,822	36.2	760	2.5	35,176	42.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	75	100.0	82,273	100.0	5,085	6.2	82,273	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,149	2,293	2.6	25.1	6,432	70.3	424	4.6
Moderate	29,879	14,339	16.4	48.0	14,099	47.2	1,441	4.8
Middle	59,262	36,527	41.8	61.6	18,890	31.9	3,845	6.5
Upper	44,863	34,149	39.1	76.1	8,867	19.8	1,847	4.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	143,153	87,308	100.0	61.0	48,288	33.7	7,557	5.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,068	3.7	1,000	3.8	59	3.5	9	3.4
Moderate	7,843	27.5	7,110	26.7	674	40.0	59	22.6
Middle	10,189	35.7	9,627	36.2	474	28.1	88	33.7
Upper	9,429	33.1	8,846	33.3	478	28.4	105	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	28,529	100.0	26,583	100.0	1,685	100.0	261	100.0
Percentage of Total Businesses:				93.2		5.9		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10	2.0	10	2.0	0	0.0	0	0.0
Moderate	81	15.9	76	15.3	5	45.5	0	0.0
Middle	178	34.9	175	35.1	2	18.2	1	100.0
Upper	241	47.3	237	47.6	4	36.4	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	510	100.0	498	100.0	11	100.0	1	100.0
Percentage of Total Farms:				97.6		2.2		0.2
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-2

2021 Northeast Colorado AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,151	22.1
Moderate	5	22.7	4,335	23.0	632	14.6	4,014	21.3
Middle	16	72.7	13,618	72.3	1,158	8.5	3,951	21.0
Upper	1	4.5	871	4.6	7	0.8	6,708	35.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	22	100.0	18,824	100.0	1,797	9.5	18,824	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,658	4,036	22.1	52.7	2,607	34.0	1,015	13.3
Middle	21,860	13,399	73.3	61.3	6,094	27.9	2,367	10.8
Upper	1,332	840	4.6	63.1	237	17.8	255	19.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	30,850	18,275	100.0	59.2	8,938	29.0	3,637	11.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	863	26.4	788	26.7	56	23.2	19	26.8
Middle	2,305	70.5	2,072	70.1	182	75.5	51	71.8
Upper	100	3.1	96	3.2	3	1.2	1	1.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,268	100.0	2,956	100.0	241	100.0	71	100.0
Percentage of Total Businesses:				90.5		7.4		2.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	126	16.5	124	16.8	2	7.1	0	0.0
Middle	595	77.8	570	77.3	25	89.3	0	0.0
Upper	44	5.8	43	5.8	1	3.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	765	100.0	737	100.0	28	100.0	0	0.0
Percentage of Total Farms:				96.3		3.7		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES

Table C-1

Distribution of 2021 Residential Lending By Income Level of Geography					
Assessment Area: Denver Metropolitan AA					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	7.5
Moderate	1	7.7	608	13.4	26.5
Middle	8	61.5	2,264	49.8	33.5
Upper	4	30.8	1,671	36.8	32.6
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	13	100.0	4,543	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-2

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Denver Metropolitan AA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	3	15.8	47	7.4	10.5
Moderate	1	5.3	54	8.5	23.0
Middle	9	47.4	322	50.6	31.0
Upper	6	31.6	213	33.5	35.0
Unknown	0	0.0	0	0.0	0.5
Tract-Unk	0	0.0	0	0.0	
Total	19	100.0	636	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-3

Distribution of 2021 Small Farm Lending By Income Level of Geography					
Assessment Area: Denver Metropolitan AA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	9.6
Moderate	1	5.9	1	0.1	17.4
Middle	14	82.4	554	38.7	37.4
Upper	2	11.8	877	61.2	33.7
Unknown	0	0.0	0	0.0	2.0
Tract-Unk	0	0.0	0	0.0	
Total	17	100.0	1,433	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-4

Distribution of 2021 Residential Lending By Borrower Income Level					
Assessment Area: Denver Metropolitan AA					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	2	15.4	314	6.9	26.0
Moderate	0	0.0	0	0.0	19.1
Middle	5	38.5	1,576	34.7	20.2
Upper	6	46.2	2,654	58.4	34.7
Unknown	0	0.0	0	0.0	0.0
Total	13	100.0	4,543	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-5

Distribution of 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Denver Metropolitan AA					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	11	57.9	254	39.9	91.8
Over \$1 Million	1	5.3	121	19.0	7.2
Revenue Unknown	7	36.8	262	41.2	1.0
Total	19	100.0	636	100.0	100.0
By Loan Size					
\$100,000 or Less	18	94.7	516	81.1	
\$100,001 - \$250,000	1	5.3	121	19.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	19	100.0	636	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	11	100.0	254	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	11	100.0	254	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bra dstreet Data 2011-2015 U.S. Census Burea u: America n Community Survey Note: Percenta ges may not total 100.0 percent due to rounding.					

Table C-6

Distribution of 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Denver Metropolitan AA					
	Bank Loans				Total Farms %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	11	64.7	514	35.9	97.4
Over \$1 Million	2	11.8	877	61.2	2.6
Revenue Unknown	4	23.5	41	2.9	0.0
Total	17	100.0	1,433	100.0	100.0
By Loan Size					
\$100,000 or Less	13	76.5	167	11.7	
\$100,001 - \$250,000	1	5.9	134	9.4	
\$250,001 - \$500,000	3	17.6	1,131	78.9	
Total	17	100.0	1,433	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	9	81.8	126	24.5	
\$100,001 - \$250,000	1	9.1	134	26.1	
\$250,001 - \$500,000	1	9.1	254	49.4	
Total	11	100.0	514	100.0	
Source: 2021 FFIEC Census Data 2021 Dun & Bra dstreet Data 2011-2015 U.S. Census Burea u: America n Community Survey Note: Percenta ges may not total 100.0 percent due to rounding.					

Table C-7

2021 Denver Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	49	12.6	45,406	11.4	13,131	28.9	103,098	26.0
Moderate	121	31.2	120,683	30.4	17,427	14.4	75,866	19.1
Middle	115	29.6	123,435	31.1	7,167	5.8	80,133	20.2
Upper	100	25.8	107,112	27.0	3,201	3.0	137,556	34.7
Unknown	3	0.8	17	0.0	0	0.0	0	0.0
Total AA	388	100.0	396,653	100.0	40,926	10.3	396,653	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	85,493	28,328	7.5	33.1	51,161	59.8	6,004	7.0
Moderate	209,069	100,616	26.5	48.1	96,581	46.2	11,872	5.7
Middle	227,710	127,214	33.5	55.9	88,487	38.9	12,009	5.3
Upper	178,329	123,838	32.6	69.4	45,740	25.6	8,751	4.9
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	700,668	380,012	100.0	54.2	282,012	40.2	38,644	5.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11,773	10.5	10,360	10.0	1,315	16.2	98	8.8
Moderate	25,902	23.0	24,016	23.3	1,733	21.3	153	13.8
Middle	34,823	31.0	32,208	31.2	2,267	27.9	348	31.4
Upper	39,348	35.0	36,196	35.1	2,649	32.6	503	45.4
Unknown	556	0.5	382	0.4	168	2.1	6	0.5
Total AA	112,402	100.0	103,162	100.0	8,132	100.0	1,108	100.0
Percentage of Total Businesses:				91.8		7.2		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	88	9.6	80	9.0	8	33.3	0	0.0
Moderate	159	17.4	155	17.4	4	16.7	0	0.0
Middle	342	37.4	336	37.7	6	25.0	0	0.0
Upper	308	33.7	303	34.0	5	20.8	0	0.0
Unknown	18	2.0	17	1.9	1	4.2	0	0.0
Total AA	915	100.0	891	100.0	24	100.0	0	0.0
Percentage of Total Farms:				97.4		2.6		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX D – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 MM or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 MM may be divided into MDs.

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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 MM or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.

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

High Plains Bank

Bank Hours

Monday – Friday 8:30 a.m. to 4:30 p.m

Main Office Location:

Bank opened October 5, 1908

**High Plains Bank
329 Main Ave., P.O. Box 158
Flagler, CO 80815
719.765.4000
719.765.4658 fax**

Geography-County 63, Tract 9923.00 Middle

Services: Lobby, Walk Up and ATM (cash dispense only)

Branch locations:

Bennett Branch opened June 29, 1998

**235 S. Ash St., P.O. Box 329
Bennett, CO 80102
303.644.4900
303.644.4904 fax**

Geography-County 01, Tract 0084.01 Middle

Services: Lobby, Drive Up and ATM (cash dispense only)

Wiggins Branch opened August 29, 2022

(built across the street from prior building purchased 8/3/01)

**401 Central Ave., P.O. Box 220
Wiggins, CO 80654
970.483.7334
970.483.7302 fax**

Geography-County 87, Tract 0002.00 Middle

Services: Lobby, Drive Up and ATM (cash dispense only)

Longmont Branch opened March 11, 2013

**600 Kimbark St.
Longmont, CO 80501
303.776.2265
303.776.3939 fax**

Geography-County 013, Tract 0134.01 Moderate

Services: Lobby, Drive Up and ATM (cash dispense only)

Keenesburg Branch opened February 6, 2023

(built new building; closed temporary space that opened 10/4/21)

**370 Veterans Way
Keenesburg, CO 80643
720.702.0123**

Geography-County 123, Tract 0025.02 Middle

Services: Lobby, Drive Up and ATM (cash dispense only)

Longmont Office opened December 21, 2023

**385 Main St.
Longmont, CO 80501
800.984.0010
303.776.3939 fax**

Geography-County 013, Tract 0133.02 Middle

Services: Loan Production Office and Trust Department

Branches Closed (during the current year and each of the prior two calendar years)

Longmont (17th-temporary) Branch opened October 19, 2021 - closed April 28, 2023

**2318 17th Avenue, Suite D
Longmont, CO 80501**

Geography-County 013, Tract 0133.05

Keenesburg (temporary) Branch opened October 4, 2021 - closed February 6, 2023

**165 N. Market St. Unit B
Keenesburg, CO 80643**


Geography-County 123, Tract 0025.02

Wiggins Branch purchased August 3, 2001 - closed August 29, 2022

**502 Central Ave., P.O. Box 220
Wiggins, CO 80654**

Geography-County 87, Tract 0002.00

Comprehensive List of Deposit Products, Loans, and Services-2025

<p><u>DEPOSIT ACCOUNTS:</u> Free Personal Checking Free Business Checking High Yield Savings Health Savings Account (HSA) Higher Yield Certificate of Deposit (CD)</p>	<p><u>PERSONAL LOANS:</u> Personal Loan Revolving line of Credit (OD protection) Home Equity Line of Credit (HELOC) Home Mortgage Construction Loan Unsecured Loan Bridge Loan Credit Builder Loan Citizenship Loan</p> <p><u>BUSINESS LOANS:</u> Small Business Administration (SBA) Loans Business Equity Line of Credit (BELOC) Commercial Loans Commercial Lines of Credit Commercial Real Estate</p> <p><u>AGRICULTURAL LOANS:</u> Equity Lines of Credit Operating Lines Land Loans Equipment</p>
<p><u>SERVICES:</u> Debit Card Wire Transfer Cashier's Checks Notary Public Direct Deposit Bill Pay/Online Banking/Cash Management Remote & Mobile Deposit Mobile Banking App 24-hour Telephone Banking Mobile Banking App Safe Deposit Boxes Faxes/Copies</p>	<p>Products and Services may change at any time.</p> <p>Please inquire about product details and most up to date terms, conditions, fees and rates.</p> <div data-bbox="1218 1764 1347 1890">  <p>EQUAL HOUSING LENDER</p> </div> <p>NMLS #411681</p>



Fee Schedule

This fee schedule shows fees that may be associated with your account. Not all fees will apply.

Fee	Schedule	Amount
Account Fees¹		
Overdraft Item Charge ^{2,3} A payment you make is paid creating an overdraft, instead of returned	Each Paid Item	\$35
Dormant Fee (after 12 months of inactivity)	Monthly	\$10
Wire Fees		
Wire Initiation Fee (Outgoing/Domestic)	Each	\$25
Wire Initiation Fee (Outgoing/International)	Each	\$50
Cash Management Service Fees		
ACH Collections Fee	Monthly	\$50
ACH Payments Fee	Monthly	\$30
Safe Deposit Box Fees⁴		
Rental Payment (vary by box size)	Yearly	\$15-\$75
Late Payment Fee (imposed at 30 days late)	One Time	\$10
Lost Key Fee	Per Loss	\$100
Fees Related to Judicial Orders		
Garnishments/Levies Fee	Each	\$100
Subpoena Research Fee	Per Hour	\$100

¹ Check Printing: Third party check printing is at the customer's expense.

² Fee applies to overdrafts created by debits, such as: check, in-person withdrawal, or other electronic means.

³ Daily cap of \$175 for total overdraft fees, per account.

⁴ Safe Deposit Box: Third party drilling cost is at the customer's expense.

Fees High Plains Bank Does Not Charge

Tired of fees that do not make sense? Switch to a bank that does not charge them. Here are some typical fees many institutions charge that High Plains Bank (HPB) does not.

Fee Description	Typical Fees	HPB
Account Fees		
Return Item (per item) A payment you make is returned, instead of paid on overdraft	~\$30	Free
Continuous Overdraft (per day) A fee charged after so many days that your account is continuously overdrawn	~\$8	Free
Monthly Service Charge Based on some minimum balance requirement	~\$5	Free
Transaction Fees		
Stop Payment (per request)	~\$25	Free
ATM Withdrawal Fee	~\$2	No Charge ^{5,6}
Transfer Fee, Automatic Sweeps (per sweep)	~\$5	Free
Telephone Transfer (per transfer) A transfer conducted on your behalf by a bank employee over the phone	~\$2	Free
Incoming Wire Fee A wire sent to your account at HPB from another financial institution	~\$10	Free
Return of Deposited Item (per item) For example, someone bounces a check written to you.	~\$10	Free
Cashier's Check (per item)	~\$10	Free
Debit Card Fees		
Debit Card Replacement (per card)	~\$10	Free
Debit Card Annual Fee (yearly)	~\$10	Free
Service Fees		
Counter or Temporary Checks (per sheet)	~\$1	Free
Paper Statement (per month) If you choose to get paper statements, instead of electronic statements	~\$3	Free
Additional / Duplicate Paper Statement	~\$6	Free

⁵ High Plains Bank does not charge a fee to use any ATM.

⁶ The ATM owner may assess a charge for ATM usage. See HPBGO.com for nationwide fee free ATM locations.



HIGH PLAINS BANK

Employee Owned • Community Driven

High Plains Bank CRA Assessment Area

Our assessment areas have been determined based on where the loan applications originate and where our marketing efforts are directed. The following assessment shall be considered effective from the date of the Bank's CRA Performance Evaluation dated April 25, 2022.

The Rural/Non-Metropolitan Area includes all of Kit Carson, Lincoln, Morgan, Logan and Washington counties. This area is serviced by our Flagler & Wiggins locations.

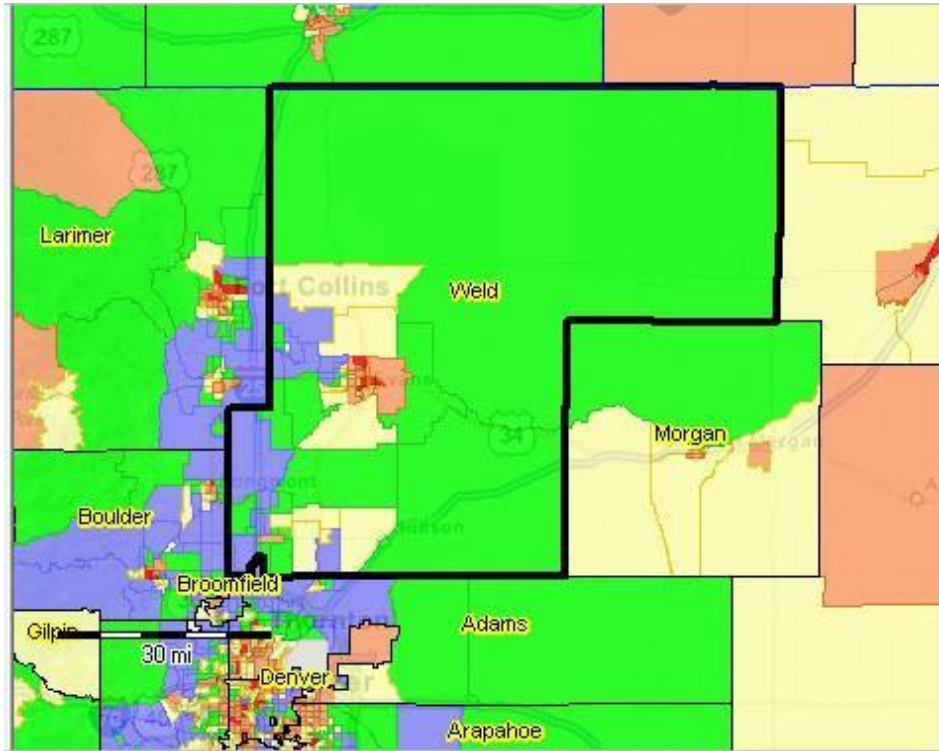
The Wiggins & Keenesburg Areas include the Greeley MSA (all of Weld County).

The Bennett Area includes all of Adams & Arapahoe counties.

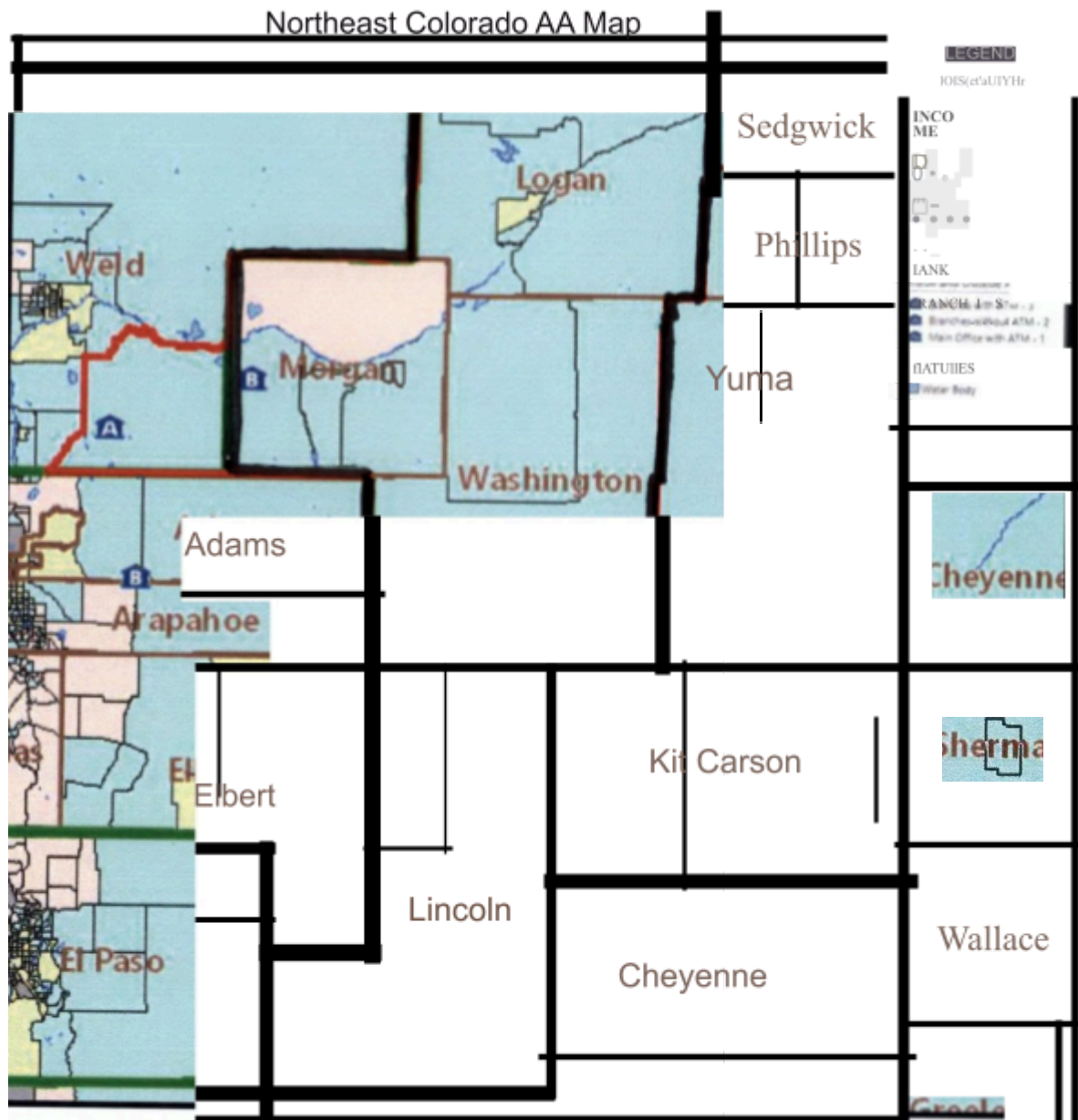
The Longmont Assessment Area includes all of Boulder county and those cities and communities surrounding Longmont in Larimer County (Census Tracts: 26 & 27).

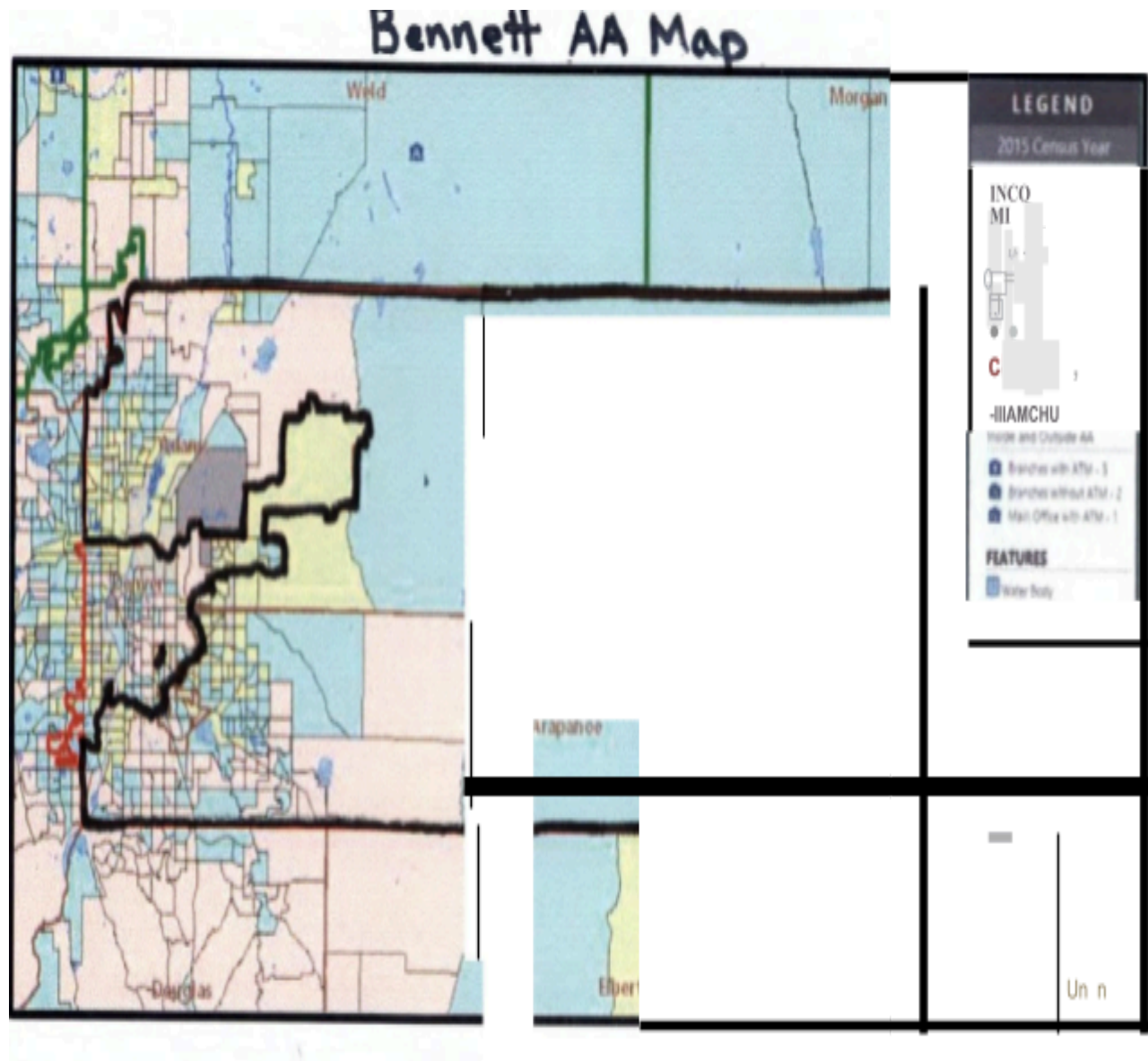


Greeley MSA

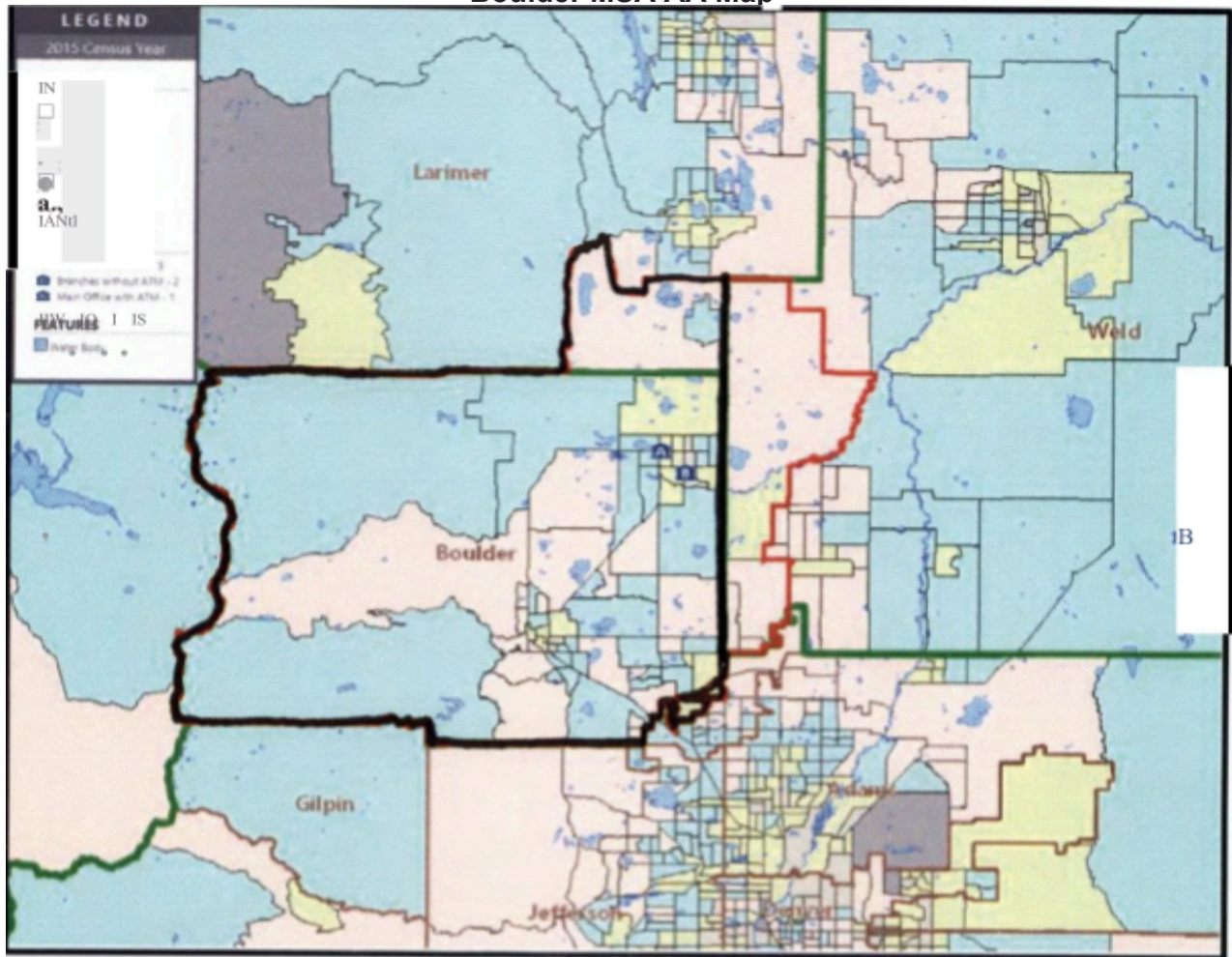


Northeast Colorado AA Map





Boulder MSA AA Map



High Plains Bank HMDA Disclosure Statement may be
obtained on the Consumer Financial Protection Bureau's
website:

<https://ffiec.cfpb.gov/data-publication/modified-lar/>



HIGH PLAINS BANK
Employee Owned • Community Driven

Memo

To: CRA Public File
From: Mickie Hass- Compliance Officer
Re: Loan to Deposit Ratio

Q1 2024 = 0.94

Q2 2024 = 0.93

Q3 2024 = 0.93

Q4 2024 = 0.95