

## PUBLIC DISCLOSURE

October 11, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank, Cortez Charter Number 14833

2258 East Main Street Cortez, CO 81321

Office of the Comptroller of the Currency

Denver Field Office 1050 17th Street, Suite 1500 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 Satisfactory

The lending test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of the bank's loans are inside the Assessment Area (AA).
- The Loan to Deposit Ratio (LTD) is reasonable when compared to similarly situated institutions.
- The geographic distribution reflects a reasonable distribution of loans across geographies of different income levels in the AA.
- The borrower distribution reflects an excellent distribution of loans to small businesses and borrowers of different income levels.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The bank's average quarterly LTD ratio over the evaluation period was 63.0 percent. The bank's ratio ranged from a high of 74.0 percent to a low of 53.8 percent. The average LTD ratio of four comparable institutions operating in the same region was 63.8 percent, with a high-average ratio of 70.3 percent, and a low-average ratio of 48.2 percent during the evaluation period. The First National Bank, Cortez's (FNBC) LTD ratio is in line with the comparator banks during the evaluation period, reflecting satisfactory performance.

#### **Lending in Assessment Area**

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

The bank originated and purchased 90 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and	Lending Inside and Outside of the Assessment Area												
		Number	of Loans	3		Dolla	ar Amount	of Loans	\$(000s)				
Loan Category	Ins	side	Ou	ıtside	Total	Ins	Inside		tside	Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)			
Small Business	17	85.0	3	15.0	20	1,695	61.7	1,051	38.3	2,746			
Consumer	19	95.0	1	5.0	20	134	99.1	1	0.9	135			
Total	36	90.0	4	10.0	40	1,829	63.5	1,052	36.5	2,881			

## **Description of Institution**

FNBC is a community bank headquartered in Cortez, Colorado, a non-metropolitan area located in southwestern Colorado. FNBC is a single state institution that does not operate under a holding company structure and has no affiliates, subsidiaries, or related organizations. The bank has designated a single AA consisting of the adjacent counties of Dolores and Montezuma.

As of December 31, 2021, FNBC held \$134.0 million in total assets: \$62.5 million in net loans (46.7 percent of total assets), \$62.5 million in investments (46.6 percent of total assets), and \$8.9 million in other assets (6.7 percent of total assets). The loan portfolio consists primarily of \$50.9 million in real estate loans centered in commercial real estate (80.1 percent of loans), \$5.3 in agricultural loans (8.3 percent of loans), \$3.3 million in consumer loans (5.2 percent of loans), \$3.0 million in other commercial loans (4.7 percent of net loans), and \$1.1 million in other loans and leases (1.7 percent of loans). Tier one capital at year-end 2021 totaled \$13.0 million resulting in a Tier one leverage ratio of 9.9 percent.

FNBC offers a traditional line of consumer and commercial loan and deposit products delivered through its single branch location in Cortez, CO. The branch also includes the bank's single full-service ATM and drive-up facility. There were no branch openings or closings during the evaluation period. Lending strategies and product offerings were consistent throughout the evaluation period. There were no mergers or acquisitions impacting the bank during the evaluation period.

The PPP was enacted as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to aid small businesses in order to maintain payroll costs, avoid layoffs or salary reductions, and keep their businesses operational. During calendar years 2020 and 2021 the bank extended 170 PPP loans totaling \$3.9 million.

FNBC received a Satisfactory rating on its previous CRA examination dated July 30, 2018. 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 includes all loans originated and purchased by the bank from January 1, 2019, through December 31, 2021. Examiners evaluated the loan production during this time to determine the primary lending products by evaluating the total number of loans originated and purchased and the total dollar volume of loans originated and purchased. Our review found the largest number of originations was consumer loans and the largest amount of loans by dollar volume was commercial loans resulting in the evaluation of two primary products.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, the AA within that state was selected for a full-scope review. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for AA details.

#### **Ratings**

The bank's overall rating is based on its performance in the state of Colorado. The state rating is based on performance within the bank's single CO AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas are weighted in arriving at the respective ratings.

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

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

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

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

## **State Rating**

#### State of Colorado

**CRA** rating for the State of Colorado: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution reflects a reasonable distribution of loans to different geographies in the AA.
- The borrower distribution reflects an excellent distribution of loans to small businesses and to borrowers of different incomes.

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

Management designated Dolores and Montezuma Counties in Southwestern Colorado as its combined non-Metropolitan Statistical AA. The designated AA encompasses one CT in Dolores County and seven CTs in Montezuma County. The AA complies with applicable regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) areas.

Based on FDIC market share data as of June 30, 2021, FNBC ranked third out of six banks in the local market with 14.4 percent of deposits in the AA. Major competitors in the AA include The Dolores State Bank, Zions Bancorporation, N.A., and Four Corners Community Bank who together hold a combined 76.5 percent of deposits in the bank's AA. Total loan production during the evaluation period was \$82.0 million of which \$34.6 million was comprised of commercial loan originations and participations purchased (42.1 percent), \$31.7 million was residential real estate loans (38.6 percent), \$11.1 million was agricultural loans (13.6 percent), and \$4.6 million was consumer loans (5.7 percent). Based on market share data from 2020, there is heavy lending competition with 44 lenders making at least one loan in the AA. The most significant lending competitors were American Express National Bank, Zions Bancorporation, N.A., JP Morgan Chase Bank, N.A., and Wells Fargo Bank, N.A., who collectively captured 53.7 percent of business loan market share by number of reported loans.<sup>1</sup>

#### Economic Data:

Based on economic data from Moody's Analytics Reports dated July 2022, Colorado's economy continues to expand as it recovers from the recession with payrolls reaching prerecession levels for the first time earlier in the year. Employment relative to 2020 ranks among the top 10 nationally and unemployment continues to trend downward. Professional services and manufacturing have powered the state's economy, but job growth has slowed in May and June 2022. Housing prices continue to trend upward ahead of the national average driven by heavy demand from out of state relocations.

According to the U.S. Bureau of Labor Statistics, the average annual unemployment rate in the state of Colorado was 2.6 percent in 2019, 6.9 percent in 2020, and 5.4 percent in 2021. The national average

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annual unemployment was 5.4 percent in 2019, 8.1 percent in 2020, and 5.4 percent in 2021. Colorado had the 4<sup>th</sup> lowest unemployment rate in 2019 but experienced an uptick due to the pandemic in 2020. Colorado's unemployment rate was below the national average for both 2019 and 2020 but has matched the national average for 2021.

The following chart details the annual unemployment rates for each county in the bank's AA, which follow national and statewide trends during the pandemic.

Unemployment Rates – Annual Averages												
County 2019 (%) 2020 (%) 2021 (%)												
Dolores	2.8%	6.5%	4.7%									
Montezuma	4.0%	6.9%	5.6%									
Source: Evaluation Period: 1/1/2019-12/31/2021,	BLS Unemployment Data		·									

#### **FNB Cortez Non-MSA AA**

Table A – Den	nographic I	nformation	of the Assessn	nent Area									
Assess	Assessment Area: FNB Cortez Non-MSA AA												
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	8	0.0	37.5	62.5	0.0	0.0							
Population by Geography	27,562	0.0	27.0	73.0	0.0	0.0							
Housing Units by Geography	13,337	0.0	27.5	72.5	0.0	0.0							
Owner-Occupied Units by Geography	7,875	0.0	19.7	80.3	0.0	0.0							
Occupied Rental Units by Geography	3,248	0.0	37.2	62.8	0.0	0.0							
Vacant Units by Geography	2,214	0.0	41.1	58.9	0.0	0.0							
Businesses by Geography	3,096	0.0	20.1	79.9	0.0	0.0							
Farms by Geography	249	0.0	12.9	87.1	0.0	0.0							
Family Distribution by Income Level	7,041	24.7	22.9	21.2	31.2	0.0							
Household Distribution by Income Level	11,123	26.7	18.9	18.9	35.5	0.0							
Median Family Income Non-MSAs - CO		\$60,701	Median Housi		\$181,275								
			Median Gross	_	\$779								
			Families Belo	w Poverty Le	vel	11.9%							

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

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

#### Community Contact:

In conjunction with the CRA evaluation, examiners conducted an interview with a representative from an economic development district in the AA. The contact indicated economic conditions in the AA are strong with low unemployment through the area. The assessment area has a high retiree population with a sizable portion of the population comprised of young, educated professionals. With the area being a

popular destination for retirees, the cost of living has increased. Area businesses lost during the COVID-19 pandemic have rebounded to pre-pandemic levels. The contact identified the area's biggest financing need as housing. The contact also indicated that local financial institutions are very active in commercial lending.

## Scope of Evaluation in Colorado

A full scope review was performed for FNBC's single non-MSA AA in Colorado. The bank's lending performance to small businesses received a heavier weighting in our analysis as it represented a greater percentage of the bank's overall lending by dollar volume compared to consumer lending. Refer to Appendix A for additional details.

#### LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

## Distribution of Loans by Income Level of the Geography

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

#### Small Loans to Businesses

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

The geographic distribution of loans in the AA is satisfactory. The distribution of loans to businesses in moderate income CTs is in line with both the percentage of businesses in the AA and the aggregate lending data for the banking industry in the AA. The AA has no low income CTs.

#### Consumer Loans

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

The geographic distribution of loans in the AA is satisfactory. The distribution of loans to borrowers in moderate income CTs is in line with the percentage of households in the AA. The AA has no low income CTs.

## Distribution of Loans by Income Level of the Borrower

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

#### Small Loans to Businesses

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

The distribution of loans to small business in the AA is excellent. Table R shows the distribution of loans to small businesses underperformed the percentages of business in the AA and outperformed the aggregate lending data for the banking industry. The underperformance is partially attributable to the sample including several SBA PPP loans which did not include revenue information which is not required to be collected at the time of origination. We performed additional analysis of the bank's PPP loans using loan size as a proxy for revenue for the borrower. The table below shows that 100 percent of the bank's PPP loans were in amounts less than or equal to \$1 million. Additionally, 100 percent of loans by number were made in amounts less than or equal to \$100,000, reflecting responsiveness to the lending needs of small businesses. This additional context when combined with the initial loan sample data results in performance exceeding demographics and aggregate lending data in the AA.

Borrow Distri	Borrow Distribution of PPP Loans to Business by Loan Size in Colorado Non MSA AA											
Loan Size Number of Percent of number Dollar Volume of Percent of Dollar												
Loan Size	Loans	refeelit of fluiffoet	Loans	Volume								
\$0-\$100,000	8	100.0	132,829	100.0								
\$100,001-\$250,000	0	0.0	0	0.0								
\$250,001-\$500,000	0	0.0	0	0.0								
Total	8	100	132,829	100.0								

#### Consumer Loans

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

The distribution of loans to borrowers of different incomes is excellent. The distribution of loans to lowand moderate-income borrowers greatly exceeds the percentage of households in the AA reflecting excellent distribution of loans in the AA.

#### **Responses to Complaints**

The bank did not have 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:	01/01/2019 to 12/31/2021	01/01/2019 to 12/31/2021								
Bank Products Reviewed:	Small business and consum	Small business and consumer loans.								
Affiliate(s)	Affiliate Relationship	Products Reviewed								
N/A	N/A	N/A								
List of Assessment Areas and Type	e of Examination	•								
Rating and Assessment Areas	Type of Exam	Other Information								
States										
Colorado										
FNB Cortez Non-MSA AA	Full-Scope	The AA includes Dolores and Montezuma counties.								

## **Appendix B: Summary and State Ratings**

RATINGS	First National Bank, Cortez						
Overall Bank:	Lending Test Rating						
First National Bank, Cortez	Satisfactory						
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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

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

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

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

Table Q: Asses	Cable Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21																			
	,	Total Loa Busi	ins to S inesses		Low-I	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FNB Cortez Non -MSA AA	20	2,007	100	461	0.0	0.0	0.0	20.1	20.0	21.0	79.9	80.0	79.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	2,007	100	461	0.0	0.0	0.0	20.1	20.0	21.0	79.9	80.0	79.0	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area	ole R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												
	7	Total Loans to	Small Busines	ses	Businesses	with Revenue	es <= 1MM	Businesses wi		Businesses with Revenues Not Available			
Assessment Area:	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
FNB Cortez Non-MSA AA	20	2,007	100	461	87.4	55.0	45.3	3.3	5.0	9.3	40.0		
Total	20	2,007	100	461	87.4	55.0	45.3	3.3	5.0	9.3	40.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2019-21													
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	\$	% Of Total	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans
FNB Cortez Non- MSA AA	20	160	100	0.0	0.0	24.8	25.0	75.2	75.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessme	able V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2019-2												
	Total Consumer Loans		Low-Income Borrowers			Moderate-Income Borrowers		Middle-Income Borrowers		Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% Of Total	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans	% Of Households	% Bank Loans
FNB Cortez Non- MSA AA	20	160	100	26.7	40.0	18.9	40.0	18.9	5.0	35.5	15.0	0.0	0.0
Total	20	160	100	26.7	40.0	18.9	40.0	18.9	5.0	35.5	15.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%