PUBLIC DISCLOSURE

January 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Interstate Bank
401 North 31st Street
Billings, Montana 59101-0918
RSSD 659855

Federal Reserve Bank of Minneapolis
90 Hennepin Avenue, P.O. Box 291
Minneapolis, Minnesota 55480-0291

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 the safe operation of the institution. This evaluation is not, nor should it 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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Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this public evaluation.

The following abbreviations may be used throughout this performance evaluation:

Air Force Base	AFB
American Community Survey	ACS
Assessment Area	AA
Automated teller machine	ATM
First Interstate BancSystem, Inc., Billings, Montana	BancSystem
Community Reinvestment Act	CRA
Dun & Bradstreet	D&B
Federal Deposit Insurance Corporation	FDIC
Federal Financial Institutions Examination Council	FFIEC
Federal Housing Administration	FHA
Federal Home Loan Bank	FHLB
First Interstate BancSystem Foundation	Foundation
Federal Home Loan Mortgage Corporation	Freddie Mac
Federal National Mortgage Association	Fannie Mae
U.S. Department of Agriculture Farm Service Agency	FSA
Home Mortgage Disclosure Act	HMDA
U.S. Department of Housing and Urban Development	HUD
Low- and Moderate-Income	LMI
Low-Income Housing Tax Credit	LIHTC
Montana Board of Housing	MBOH
Mortgage-Backed Securities	MBS
Metropolitan Statistical Area	MSA
New Markets Tax Credit	NMTC
Office of Management and Budget	OMB
Payment Protection Program	PPP
U.S. Small Business Administration	SBA
South Dakota Housing Development Authority	SDHDA
Department of Veterans Affairs	VA
Wyoming Community Development Authority	WCDA

INSTITUTION RATING

INSTITUTION'S CRA RATING: First Interstate Bank's rating is Satisfactory.

Examiners evaluated the bank's CRA performance using the Large Bank CRA Examination Procedures. The following table shows the CRA performance of First Interstate Bank, Billings, Montana, with respect to the Lending, Investment, and Service Tests.

First Interstate Bank Performance Tests			
Performance Levels	***Lending Test****	***Investment Test***	***Service Test***
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
*Examiners assigned more weight to the Lending Test than to the Investment and Service Tests for determining the overall rating, in accordance with the Large Bank CRA Examination Procedures.			

Major factors supporting the institution's rating include the following:

Lending Test

- Lending activity shows excellent responsiveness to credit needs throughout its AAs.
- Overall, the distribution of loans reflects good dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the geographic distribution of loans is good throughout the AAs, including low- and moderate-income census tracts.
- The bank makes a relatively high level of community development loans overall.
- The bank made a majority of loans within its Montana, Wyoming, South Dakota, Idaho, Oregon, and Washington AAs.
- The bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.

Investment Test

- The overall level of qualified investments in the form of securities and donations is significant.
- Overall, the bank's qualified investments exhibit good responsiveness to local credit and community development needs.

Service Test

- The bank provides a relatively high level of community development services.
- Retail banking services are readily accessible to the bank's geographies and to residents, businesses, and farms throughout the AAs. Services do not vary in a way that inconveniences low- and moderate-income areas or individuals.
- Changes in the bank's network of branches, drive-up facilities, and ATMs did not adversely affect the accessibility of the bank's products and services.

INSTITUTION

DESCRIPTION OF INSTITUTION

General. First Interstate Bank is an interstate bank headquartered in Billings, Montana, and had assets of approximately $17.6 billion as of December 31, 2020. The bank operates in these six states: Idaho, Montana, Oregon, South Dakota, Washington, and Wyoming. The bank continues to effectively meet the credit and community development needs of the residents, businesses, and farms throughout its AAs. No financial constraints or legal impediments prevent the bank from serving the credit needs of its AAs. The bank's CRA rating was Outstanding at the previous evaluation dated March 18, 2019.

Structure. First Interstate BancSystem, Inc., Billings, Montana, (BancSystem) wholly owns First Interstate Bank. BancSystem is a financial and bank holding company and publicly trades its stock on the NASDAQ stock exchange with the stock symbol FIBK. BancSystem also owns several special purpose entities for issuing trust preferred securities.

BancSystem acquired Northwest Bancorporation, Inc., the bank holding company of Inland Northwest Bank (INB), Spokane, Washington, on August 16, 2018, and on November 10, 2018, INB merged with First Interstate Bank. In addition, on April 8, 2019, BancSystem acquired Idaho Independent Bank (IIB), Coeur d'Alene, Idaho, and Community 1st Bank, Post Falls, Idaho, and merged those acquisitions into First Interstate Bank.

First Interstate BancSystem Foundation (Foundation) is the charitable affiliate of BancSystem and is funded by the bank. The foundation provides financial resources and leadership to various nonprofit organizations and charitable endeavors in the communities the bank serves.

Loan Portfolio. As of December 31, 2020, the bank's loan portfolio totaled $9.9 billion. The portfolio consisted of 65.8% commercial, 13.9% residential real estate, 9.4% consumer closed-end, 4.7% agriculture, 4.6% consumer open-end, and 1.5% other loans. Total assets increased by 44.7% since December 31, 2017; growth has been organic and through acquisitions.

Credit Products. The bank offers closed- and open-end consumer, residential real estate, commercial, and agricultural loan products to meet the needs of residents, businesses, and farms in its AAs. For a list of and information on the innovative and flexible loan programs the bank participates in, refer to the Innovative and Flexible Lending Practices section of this report.

Offices. The bank operates a network of branches and ATMs in Montana, Wyoming, South Dakota, Idaho, Oregon, and Washington. In addition to the bank's main office in Billings, Montana, the bank operated 143 branches plus six standalone drive-up facilities as of December 31, 2020. As of that same date, the bank operated 45 offices in Montana, 18 in Wyoming, 14 in South Dakota, 23 in Idaho, 32 in Oregon, and 18 in Washington, for a total of 150 offices. As of December 31, 2020, the bank also operated two loan production offices. During the evaluation period, the number of branches changed as the bank merged with other institutions, opened or relocated branches, and consolidated or closed branches. Refer to the Retail Banking Services discussion in the Service Test section for more details on the bank's retail delivery systems.

Assessment Areas. During the evaluation period, the bank had 40 AAs.[1] As shown in the following table, the bank had eleven AAs in Montana, six in Wyoming, three in South Dakota, three in Idaho, ten in Oregon, and seven in Washington. Additional details, including changes during the evaluation period for AAs, as well as the retail delivery network, are in the applicable AA sections of this evaluation.

Assessment Area Information as of December 31, 2020	
Name	***Geographic Delineation***
State of Montana	
Billings, MT MSA	Carbon, Stillwater, and Yellowstone counties
Great Falls, MT MSA	Cascade County
Missoula, MT MSA	Missoula County
Bozeman, MT	Gallatin County and most of Park County
Hardin-Miles City, MT	Big Horn, Custer, and Rosebud counties
Kalispell, MT	Flathead, Lake, and Lincoln counties
Hamilton, MT	Ravalli County
Cut Bank, MT	Most of Glacier County
Helena, MT	Lewis and Clark County
Ennis, MT	Madison County
Absarokee, MT (2018 only)[2]	Stillwater County
State of Wyoming	
Casper, WY MSA	Natrona County
Cheyenne, WY MSA	Laramie County
Laramie, WY	Albany County
Sheridan-Gillette, WY	Campbell, Johnson, and Sheridan counties
Riverton, WY	Fremont County
Jackson, WY	Teton County

[1] The bank added King County in the state of Washington to its footprint in December 2020. King County is not included in this evaluation given this change's proximity to the end of the evaluation period.
[2] Effective as of 2019, the Absarokee AA was part of the Billings MSA AA due to OMB changes to MSA delineations.

Assessment Area Information as of December 31, 2020	
Name	***Geographic Delineation***
State of South Dakota	
Rapid City-Spearfish, SD CSA	Meade, Pennington, and Lawrence counties
Belle Fourche, SD	Butte County
Custer-Hot Springs, SD	Custer and Fall River counties
State of Idaho	
Boise City-Mountain Home-Ontario, ID-OR CSA	Ada, Canyon, Gem, Payette, and Elmore counties in Idaho, one tract of Malheur County in Oregon
Coeur d'Alene, ID MSA	Kootenai County
Ketchum, ID	Blaine County
State of Oregon	
Bend-Prineville, OR CSA	Deschutes and Crook counties
Medford-Grants Pass, OR CSA	Josephine and Jackson counties
Eugene-Springfield, OR MSA	Lane County
Portland-Vancouver-Salem, OR-WA CSA	Clackamas, Multnomah, Marion, Polk, and Washington counties in Oregon, Clark County in Washington
Seaside, OR	Clatsop County
Klamath Falls-Roseburg, OR	Coos, Douglas, and Klamath counties
Hood River, OR	Hood River County
Madras, OR	Jefferson County
Newport-Lincoln City, OR	Lincoln County
The Dalles, OR	Wasco County
State of Washington	
Spokane-Spokane Valley, WA MSA	Spokane County
Kennewick-Richland, WA MSA	Benton County
Seattle-Bellevue-Kent, WA MD	Snohomish County
Bingen, WA	Klickitat County
Colfax, WA	Whitman County
Ephrata, WA	Grant County
Raymond-Westport, WA	Grays Harbor, Pacific, and Wahkiakum counties

During the evaluation period, the bank added eight additional AAs (included in the table above) with the INB merger and one additional AA with the IIB acquisition. With the INB merger, the bank added the following AAs: Coeur d'Alene ID MSA; Kennewick-Richland, WA MSA; Spokane-Spokane Valley, WA MSA; Bingen, WA; Colfax, WA; Ephrata, WA; The Dalles, OR; and Hood River, OR. With the IIB acquisition, the bank added the Ketchum, ID AA. The Community 1st Bank acquisition did not result in new AAs. Finally, the bank also began operating in three new states (Idaho, Oregon, and Washington) with the merger of the Bank of the Cascades (BOTC), Bend, Oregon, in August 2017, towards the end of the prior evaluation period.[3]

[3] The resulting 11 new AAs as of 2017 are Boise City-Mountain Home-Ontario ID-OR CSA; Bend-Prineville, OR CSA; Eugene-Springfield, OR MSA; Medford-Grants Pass, OR CSA; Portland-Vancouver-Salem OR-WA CSA;

SCOPE OF EVALUATION

Examiners selected nine of the bank's AAs for full-scope reviews. To select the AAs for full-scope reviews, examiners reviewed factors such as loan volume, deposit market share, branch size and location, length of time since the last full-scope review, new banking operations, and community development activity. For interstate banks, examiners must conduct a full-scope review of at least one AA from each state. A full-scope review requires examiners to evaluate the bank's quantitative and qualitative performance using the following criteria: lending activity, lending to borrowers of different income levels and to businesses and farms of different sizes, geographic distribution of loans throughout the AA, community development lending, flexible and/or innovative lending practices, qualified investments, retail services, and community development services. The other AAs receive limited-scope reviews in which examiners analyze quantitative data about the bank's lending, investments, and services.

The AAs selected for full-scope reviews represent 55.0% of the bank's loans by number of loans and 54.0% by dollar amount of loans, according to loan data from January 1, 2018, to December 31, 2020. Examiners conducted full-scope reviews of the following AAs:

- Billings, Montana MSA AA
- Bozeman, Montana AA
- Casper, Wyoming MSA AA
- Sheridan-Gillette, Wyoming AA
- Bend-Prineville, Oregon, CSA AA
- Medford-Grants Pass, Oregon CSA AA
- Boise City-Mountain Home-Ontario, Idaho-Oregon CSA AA
- Rapid City-Spearfish, South Dakota CSA AA
- Spokane-Spokane Valley, Washington MSA AA

In determining the overall CRA rating, examiners placed the greatest weight on the bank's activities in its Montana and Wyoming AAs because the majority of the bank's lending occurs in these AAs. Examiners weighted the conclusions in the state of Montana more than Wyoming given the higher volume of lending activity in the Montana full-scope AAs and higher overall percentage of lending activity in the state of Montana. During the evaluation period, the bank extended approximately 39.6% and 23.4% of its HMDA, consumer, small business, small business secured by real estate, and small farm loans, by number, in the Montana and Wyoming AAs, respectively.[4] The comparative approximate percentages for the remaining states were as follows: South Dakota AAs (13.5%), Oregon AAs (11.8%), Idaho AAs (7.7%), and Washington AAs (2.9%). Examiners weighted these remaining states based on those percentages, with Washington receiving the least amount of weight. For the states with two full-scope AAs, examiners placed the most weight on one AA based on loan volume. For Montana, examiners placed the greatest weight on the Billings MSA AA. For Wyoming, examiners generally placed the greatest weight on the Sheridan-Gillette AA. For Oregon, examiners placed the greatest weight on the Bend-Prineville CSA AA.

Because of the bank's size and its branches in MSAs, HMDA requires the bank to report home purchase, refinance, home improvement, multifamily, and other purpose closed/exempt loans. The bank must report small business, small farm, and community development loans because of its asset size. To understand

Seaside, OR; Klamath Falls-Roseburg, OR; Madras, OR; Newport-Lincoln City, OR; Seattle-Bellevue-Kent, WA MD; and Raymond-Westport, WA.

[4] Based on the total number of loans extended inside the bank's AAs during the three-year evaluation period.

the bank's CRA performance, examiners evaluated the bank's reported 2018, 2019, and 2020 HMDA, small business, and small farm loans.[5] Examiners compared the bank's HMDA, small business, and small farm lending performance to that of aggregate lenders that originated or purchased loans in the AAs in 2018, 2019, and 2020.[6] Examiners also based the analysis on the bank's consumer-related loans for the same years because consumer loans are a material product, and the bank chose to report this optional loan data. Examiners also evaluated the bank's 2018, 2019, and 2020 community development loans, qualified investments, and community development services and retail service activity.

Examiners also analyzed the demographic characteristics of each AA as one way to measure loan demand. For HMDA loans, examiners relied on demographic information, primarily from 2020 FFIEC adjusted census data, to understand the income levels and geographic locations of the families and housing units in the AAs.[7] For small business and small farm loans, examiners used D&B data for the applicable year. D&B collects and publishes this self-reported data concerning the revenues and locations of local businesses and farms. The demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Instead, examiners reviewed the demographic data to provide context for the bank's performance, along with the information obtained from bank management and community contacts.

As part of this evaluation, examiners had discussions with bank management and community contacts regarding local economic conditions, demographic characteristics, the performance of local financial institutions, and opportunities to participate in community development activities. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition. Examiners considered these factors as well as the size and financial condition of the bank when evaluating its performance. The contacts did not identify any unmet credit needs in the bank's AAs.

The full-scope AA sections of this performance evaluation describe each AA's unique performance context. The bank's AAs have varying characteristics, which impact loan demand as well as community development opportunities. Some of the AAs include metropolitan areas or include cities with various industries, while some AAs are more rural. Generally, throughout the evaluation period, many of the bank's AAs had stable or growing economies. The onset of the COVID-19 pandemic impacted AAs in various ways; the impact to the full-scope AAs is discussed in the relevant portions of this evaluation. Generally, the bank's small business lending and HMDA lending increased during the evaluation period due to the SBA's PPP loan program for businesses and the low interest rate environment for home loans. In the full-scope AAs, as well as many other AAs, the bank faces strong competition among various types of financial institutions and other creditors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA rating is Satisfactory based on the ratings for the Lending, Investment, and Service Tests. Overall, the bank did a good job of serving the credit and community development needs of its AAs in Montana, Wyoming, South Dakota, Oregon, Idaho, and Washington.

[5] Examiners reviewed small farm loans in one of the bank's full-scope AAs, the Rapid City-Spearfish, South Dakota CSA AA, based on lending volume. Examiners also reviewed small farm loans in some limited-scope AAs.
[6] Examiners concluded that the bank's 2018 lending performance by loan type was generally consistent with the 2019 and 2020 lending performance; this evaluation does not include a detailed discussion of the 2018 lending performance.
[7] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the OMB revised MSA delineations.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity
- Lending to borrowers of different income levels and to businesses and farms of different sizes
- Geographic distribution of loans
- Lending inside the bank's AAs
- Community development lending
- Use of innovative and/or flexible lending practices

To evaluate the bank's performance, examiners generally placed equal weight on the criteria of borrower distribution, geographic distribution, community development lending, and lending activity, followed by lending inside the bank's AAs. Further, examiners generally assigned less weight to the geographic distribution of loans if an AA did not include low- or moderate-income census tracts. Finally, the bank's overall extensive use of innovative and/or flexible lending practices contributed to the Lending Test rating.

Examiners evaluated the bank's qualified investments and its retail and community development services under the Investment and Service Tests, respectively.

LENDING TEST

The bank's Lending Test rating is high satisfactory. Overall, the bank's lending to LMI borrowers and to small businesses and small farms is good. The geographic distribution and dispersion of loans is good. The bank makes a relatively high level of community development loans, and it makes extensive use of innovative and/or flexible lending practices. The bank's lending activity shows excellent responsiveness to credit needs throughout its AAs. Finally, the bank made a majority of its loans inside its AAs.

The bank is an interstate bank. It did not operate in any multistate MSAs during the evaluation period. The regulation requires a separate analysis for each state in which the bank operates. This analysis must include at least one AA from each state. However, examiners evaluate the overall lending activity and the concentration of lending inside the AAs at the institution level; both criteria are discussed below. For a detailed discussion of other Lending Test criteria, see the individual AA sections of this evaluation. For the limited-scope AAs, please see Appendix D for tables displaying the borrower and geographic distributions, as well as demographic and aggregate lender information.

Lending Activity

The bank's lending activity demonstrates excellent responsiveness to the credit needs of the AAs. The Summary of Lending Activity table shows the bank's HMDA-reportable, CRA-reportable, and consumer lending activity, by number and dollar amount, from January 1, 2018, to December 31, 2020.

Summary of Lending Activity

Loan Type	#	%	$(000s)	%
Motor Vehicle	29,964	56.8%	759,761	61.6%
Other - Secured	12,206	23.1%	321,797	26.1%
Other – Unsecured	10,632	20.1%	152,489	12.4%
Total Consumer related	**52,802**	**50.0%**	**1,234,047**	**13.20%**

Summary of Lending Activity				
Loan Type	**#**	**%**	**$(000s)**	**%**
Home Purchase	9,738	42.4%	2,620,651	47.9%
Home Improvement	2,309	10.1%	222,725	4.1%
Multi-Family Housing	221	1.0%	471,367	8.6%
Loan Purpose Not Applicable	35	0.2%	3,254	0.1%
Other Purpose Closed-End	166	0.7%	17,648	0.3%
Refinancing	8,385	36.5%	1,918,044	35.1%
Total HMDA Related	**22,951**	**21.7%**	**5,472,709**	**58.7%**
Home Equity	18	100.0%	4,903	100.0%
Total Non-HMDA Related	**18**	**0.1%**	**4,903**	**0.10%**
Small Business	25,577	98.5%	2,245,649	97.3%
Small Business - Secured by Real Estate	390	1.5%	63,540	2.8%
Total Small Business Related	**25,967**	**24.6%**	**2,309,189**	**24.8%**
Small Farm	3,879	100.0%	302,859	100.0%
Total Small Farm Related	**3,879**	**3.7%**	**302,859**	**3.3%**
TOTAL LOANS	**105,617**	**100.0%**	**9,323,707**	**100.0%**

Based on this lending data, the bank's primary business lines are consumer, residential real estate, and small business lending. Loan volume and predominant loan types vary by AA. Generally, the bank is an active HMDA, consumer, and small business lender in most AAs. Small farm loans are a primary business line in a few AAs. The bank is among the leading lenders for CRA- and HMDA-reportable loans in several AAs, including the full-scope AAs in Montana and Wyoming (the states given the most weight for performance criteria conclusions). Overall, the bank's lending activities show excellent responsiveness to credit needs in its AAs. For detailed information regarding lending activity, see each full-scope AA section.

Assessment Area Concentration

The bank extended a majority of its loans inside its AAs. The table below shows the bank's concentrations of lending inside and outside the AAs from January 1, 2018, to December 31, 2020.

Lending Inside and Outside the Assessment Areas								
Loan Type	**Inside**				**Outside**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
Motor Vehicle	12,771	42.6	315,594	41.5	17,193	57.4	444,167	58.5
Other - Secured	7,028	57.6	173,798	54.0	5,178	42.4	147,999	46.0
Other - Unsecured	9,916	93.3	141,051	92.5	716	6.7	11,438	7.5
Total Consumer Related	**29,715**	**56.3**	**630,443**	**51.1**	**23,087**	**43.7**	**603,604**	**48.9**
Home Purchase - Conventional	7,179	89.6	1,927,630	87.4	829	10.4	278,285	12.6
Home Purchase - FHA	1,033	92.5	214,392	92.9	84	7.5	16,482	7.1
Home Improvement	2,170	94.0	205,124	92.1	139	6.0	17,601	7.9
Multi-Family Housing	197	89.1	396,310	84.1	24	10.9	75,057	15.9
Loan Purpose Not Applicable	35	100.0	3,254	100	0.0	0.0	0.0	0.0
Other Purpose Closed-End	153	92.2	15,566	88.2	13	7.8	2,082	11.8
Other Purpose LOC	1,982	94.5	205,859	94.0	115	5.5	13,161	6.0
Refinancing	7,829	93.4	1,785,263	93.1	556	6.6	132,781	6.9
Home Purchase - VA	557	90.9	165,922	90.2	56	9.1	17,940	9.8
Total HMDA Related	**21,135**	**92.1**	**4,919,320**	**89.9**	**1,816**	**7.9**	**553,389**	**10.1**
Home Equity	17	94.4	4,603	93.9	1	5.6	300	6.1
Total Non-HMDA Related	**17**	**94.4**	**4,603**	**93.9**	**1**	**5.6**	**300**	**6.1**

Lending Inside and Outside the Assessment Areas								
Loan Type	**Inside**				**Outside**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
Small Business	22,989	89.9	2,048,498	91.2	2,588	10.1	197,151	8.8
Small Business - Secured by Real Estate	366	93.8	58,573	92.2	24	6.2	4,967	7.8
Total Small Business Related	**23,355**	**89.9**	**2,107,071**	**91.2**	**2,612**	**10.1**	**202,118**	**8.8**
Small Farm	3,025	78.0	234,497	77.4	854	22.0	68,363	22.6
Total Small Farm Related	**3,025**	**78.0**	**234,497**	**77.4**	**854**	**22.0**	**68,363**	**22.6**
TOTAL LOANS	**77,247**	**73.1**	**7,895,934**	**84.7**	**28,370**	**26.9**	**1,427,773**	**15.3**

The bank extended 73.1% of all loans by number and 84.7% by dollar amount within its AAs. The bank's lending inside the AAs varies somewhat based on product; however, consumer lending represents a much lower percentage in the AAs than the other products. This lower percentage can be attributed to indirect lending related to motor vehicle loans. Also, generally, the bank made some of the loans outside of its AAs in nearby counties, which is reasonable given the bank's presence across large geographical areas.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among LMI borrowers and businesses and farms of different sizes is good. The bank originates HMDA loans to LMI borrowers and lends to farms and businesses of different sizes in its AAs as well.

Geographically, the bank's performance in low- and moderate-income census tracts in its AAs is good. The bank's lending patterns do not reveal any unexplained gaps in any of the AAs.

Innovative and Flexible Lending Practices

The bank makes extensive use of innovative and/or flexible lending programs. These programs help meet the credit needs of LMI consumers, small businesses, and small farms. The following list highlights the programs the bank participated in during the evaluation period:

- *Montana Board of Housing:* MBOH helps make homeownership affordable for first-time homebuyers by offering low-interest-rate mortgages and down payment assistance. Eligible borrowers must meet income limits established by MBOH and must qualify for an FHA, RD, VA or HUD Section 184 program loans.
- *Wyoming Community Development Authority:* WCDA provides mortgages with low interest rates to first-time homebuyers. It also offers second mortgages that provide a portion of the down payment and closing costs. The standard homebuyer program is for individuals whose income is at or below the program's income limits and who are purchasing a home within the state. Eligible borrowers have to meet income limits established by WCDA.
- *South Dakota Housing Development Authority:* SDHDA offers a variety of programs that assist LMI borrowers in South Dakota. SDHDA offers low-interest-rate mortgages, closing cost and

down payment assistance, and home improvement loans. Eligible borrowers must meet income limits established by SDHDA.

- *NeighborWorks Montana:* This program provides down payment and closing cost assistance to borrowers who meet the program's eligibility requirements, including income limits.
- *City of Billings First-Time Home Buyer Program:* This program provides zero interest, no payment loans to help low-income households purchase their first home. The loan is repaid in full when the homeowner sells, refinances, or no longer occupies the home.
- *Jackson Hole Community Housing Trust and Jackson/Teton County Housing Authority:* These housing organizations help provide access to affordable housing in the Jackson, Wyoming, and Teton County, Wyoming area. Borrowers must meet income-eligibility guidelines.
- *HomeReady:* This Fannie Mae program offers flexibility in underwriting and requirements for qualified borrowers who meet specific income criteria. It also has a low down payment requirement.
- *Idaho Housing and Finance Association*: This organization helps provide mortgage programs with low interest rates, as well as down payment and closing cost assistance, to income-qualified individuals.
- *Energy West*: This organization facilitates a zero-interest loan program, which is offered through the bank, to provide financial assistance to struggling customers for the purchase of gas appliances, including furnaces and water heaters.
- *Wyoming Technology Access Program*: The bank's Laramie branch partners with Wyoming Institute for Disabilities and Wyoming Independent Living Rehabilitation to offer a financing program for Wyoming residents with disabilities or their family members. The program allows these individuals to apply for reduced interest loans to purchase assistive technology equipment and services.
- *Small Business Administration*: SBA loans have flexible underwriting criteria for small businesses and are often extended to businesses that cannot qualify for conventional financing.
- *Farm Service Agency*: FSA loans have flexible underwriting criteria and are often extended to farmers who cannot qualify for conventional financing.
- *Junior Livestock Program*: The Junior Livestock Program is a program introduced by the Laramie branch in 2015. This program finances livestock purchases for 4-H and Future Farmers of America students who are unable to fund the project up front. While the student's parent or guardian is on the note, the bank does not consider their credit history or ability to repay. The loan is repaid by the sale of the livestock.
- *Veterans Affairs Home Loans*: VA home loans help eligible borrowers purchase a home at a competitive interest rate, often without requiring a down payment or private mortgage insurance.
- *Federal Housing Administration Loans*: FHA loans are designed for LMI borrowers. These loans typically require lower down payments and credit scores than conventional loans.
- *HomeNow*: This MoFi program offers down payment assistance to low-, moderate-, and middle-income homebuyers in Montana. The program offers a 30-year fixed-rate mortgage plus a non-repayable grant or deferred second mortgage at zero percent interest for down payment and closing cost assistance.
- *U.S. Department of Agriculture Business and Industry (B&I) Guaranteed Loan Program*: The USDA B&I program is a loan guarantee program designed to help credit-worthy rural businesses obtain needed credit for most any legal business purpose. The intent of the program is to save and create jobs in rural America. Borrowers can benefit from better pricing and terms with the B&I loan guarantee in place than are typically given with conventional loans.
- *Paycheck Protection Program Lending*: PPP loans are SBA-backed loans that helped businesses keep their workforce employed during the COVID-19 pandemic.

During the evaluation period, the bank made loans totaling over $1.4 billion through the innovative and flexible loans programs noted above. These loans are included in the overall volume of loans evaluated under the Lending Test. For information on the use of these programs in the various states and full-scope AAs, refer to the applicable performance evaluation sections for more details.

Community Development Lending

The bank makes a relatively high level of community development loans. The bank originated 105 community development loans totaling $226.2 million during the evaluation period that benefit its AAs, as well as broader statewide or multistate areas including its AAs. By number of loans, the bank extended 8.6% of its community development loans in the Bend-Prineville, OR CSA AA, and 6.7% in each of the following AAs: Laramie, WY; Bozeman, MT; and the Missoula, MT MSA. In addition, by number of loans, the bank had 21.9% benefiting the statewide area of Oregon. By dollar amount of loans, the bank's community development lending was highest in the Bozeman, MT AA (19.2%), the Spokane-Spokane Valley, WA MSA AA (16.5%) and the Portland-Vancouver-Salem, OR CSA AA (15.3%). Of the community development loans, 66 loans totaling $100.8 million had an affordable housing purpose, which is a significant need in many of the bank's AAs. Some of the community development loans with an affordable housing purpose were part of LIHTC projects, which are complex. The bank also made 22 loans totaling $93.9 million that supported revitalization or stabilization of qualified geographies or designated disaster areas. The remaining loans were a mix of loans that supported community services to LMI individuals as well as economic development, including a NMTC project.

Community Development Loans by Assessment Area, Statewide, or Multistate Area		
Assessment Area	**#**	**$**
Montana		
Billings, MT MSA	4	10,515,095
Great Falls, MT MSA	3	695,845
Missoula, MT MSA	7	17,279,791
Bozeman, MT	7	43,452,446
Hamilton, MT	3	8,832,374
Hardin-Miles City, MT	3	721,409
Kalispell, MT	1	4,459,702
Statewide Montana	1	500,000
Wyoming		
Casper MSA, WY	1	424,000
Cheyenne MSA, WY	1	8,000,000
Laramie, WY	7	7,951,250
Riverton, WY	3	1,808,632
Sheridan-Gillette, WY	1	150,000
South Dakota		
Rapid City-Spearfish, SD CSA	2	1,365,000
Idaho		
Boise City-Mountain Home-Ontario, ID-OR CSA	4	9,306,440
Statewide Idaho	1	217,000

Community Development Loans by Assessment Area, Statewide, or Multistate Area		
Assessment Area	**#**	**$**
Washington		
Seattle-Bellevue-Kent, WA MD	1	2,000,000
Spokane-Spokane Valley, WA MSA	7	37,366,607
Oregon		
Bend-Prineville, OR CSA	9	16,577,980
Eugene-Springfield, OR MSA	2	8,729,248
Madras, OR	2	630,068
Medford-Grants Pass, OR CSA	4	4,859,600
Portland-Vancouver-Salem, OR-WA CSA	6	34,713,600
The Dalles, OR	1	50,000
Statewide Oregon	23	3,398,488
Multistate Areas		
Multistate - Montana, Idaho, Utah, and Wyoming	1	2,200,000
Total	**105**	**226,204,575**

The bank did not make any community development loans in 18 AAs: Absarokee, MT (2018 only); Cut Bank, MT; Ennis, MT; Helena, MT; Jackson, WY; Belle Fourche, SD; Custer-Hot Springs, SD; Seaside, OR; Klamath Falls-Roseburg, OR; Hood River, OR; Newport-Lincoln City, OR; Kennewick-Richland, WA MSA; Raymond-Westport, WA; Bingen, WA; Colfax, WA; Ephrata, WA; Coeur d'Alene, ID MSA; and Ketchum, ID. This lack of lending is reasonable given performance context. First, the bank competes with other financial institutions for community development lending opportunities, including in some AAs where the bank is not among the leading lenders. Second, community development lending opportunities vary among the bank's AAs and are limited in some AAs.

Because the bank was responsive in meeting the credit and community development needs of its AAs, examiners also considered five community development loans totaling $40.7 million that benefited areas outside of the bank's AAs.

INVESTMENT TEST

The Investment Test rating is high satisfactory because the overall level of qualified investments, including donations, is significant. During the evaluation period, qualified investments, including donations, benefiting the bank's AAs and broader statewide or multistate areas including the AAs totaled $110.1 million.

Investments (non-donation). The following table shows the list of qualified investments, including new and prior period, by the bank's AA or statewide and multistate areas that include the bank's AAs. The bank made 10 new investments totaling $42.8 million during the evaluation period and continued to hold 107 prior period investments totaling $63.3 million. Overall, the level of investments shows good responsiveness to the credit needs and community development needs of the AAs. A significant majority of the bank's new investments, by number and dollar, supported affordable housing, which is a significant need in many of the bank's AAs. Some of these affordable housing investments were part of LIHTC

projects, which are complex. Two of the new investments promoted economic development and involved NMTC projects.

Qualified Investments by Assessment Area or Statewide/Multistate Area		
	Investments	
	#	$
Montana		
Billings MSA AA	4	20,248,196
Great Falls MSA AA	1	1,289,933
Missoula MSA AA	3	8,973,293
Bozeman AA	7	13,875,188
Hamilton AA	3	1,280,000
Hardin-Miles City AA	5	4,711,402
Helena AA	1	2,145,975
Kalispell AA	3	1,384,743
Cut Bank AA	1	2,293,200
Statewide Montana	5	500,000
Statewide Montana MBS	14	2,013,485
Wyoming		
Cheyenne MSA AA	3	9,847,562
Jackson AA	2	3,945,338
Laramie AA	1	8,549,787
Riverton AA	2	2,945,960
Sheridan-Gillette AA	2	100,000
Oregon		
Portland-Vancouver-Salem CSA AA	2	3,770,458
Statewide Oregon	2	200,000
South Dakota		
Rapid City CSA AA	1	700,000
Belle Fourche AA	1	215,000
Custer-Hot Springs AA	4	1,625,000
Statewide South Dakota	7	2,775,000
Washington		
Seattle MD AA	1	1,778,938
Spokane MSA AA	1	1,000,000
Multi-state Areas		
Multistate MBS	40	9,624,983
Multistate Idaho and Nevada	1	250,000
Total	**117**	**106,043,441[8]**

[8] This figure includes investments / securities that matured, were sold or paid during the evaluation period.

The bank did not make new non-donation investments in many of its AAs or in the states of Idaho and South Dakota; this lack of investments is generally reasonable given performance context. First, the bank competes with other financial institutions for qualified investment opportunities, including in some AAs where the bank is not among the leading lenders. Second, qualified investment opportunities vary among the bank's AAs and are limited in some AAs.

Since the bank was responsive to the community development needs of its AAs, examiners also considered qualified investments that benefited areas outside of the bank's AAs, which totaled $10.5 million. All of these investments were prior-period investments, except one for $2.1 million involving a NMTC project that was obtained during the evaluation period.

Donations. The bank made an excellent level of qualified investments in the form of donations that directly benefited the bank's AAs or broader regional, statewide, or multistate areas that include the bank's AAs. These donations totaled approximately $4.1 million, as shown in the table below. The donations include money the Foundation donates through the employee match and Foundation grant programs.

Qualified Investment Donations Benefiting Assessment Areas or Broader Regional, Statewide, or Multistate Areas		
Purpose	#	$
Affordable Housing	133	315,031
Community Services	2,282	3,310,421
Economic Development	35	178,299
Revitalize or Stabilize	40	255,173
Total	**2,490**	**4,058,924**

Donations primarily focused on community services to LMI, but also addressed other initiatives. Donations also addressed needs of those individuals, such as food insecurity and access to health care or shelter, during the pandemic. The charitable contributions show excellent responsiveness to community development needs. Additional details are presented in the analysis of each state and full-scope AA.

Since the bank was responsive to the community development needs of its AAs, examiners also considered qualified investment donations that benefited areas outside of the bank's AAs, which totaled $13,850 and focused on community services to LMI.

SERVICE TEST

The bank's Service Test rating is high satisfactory based on performance in the full-scope AAs. Delivery systems are readily accessible to low- and moderate-income individuals and geographies in the bank's AAs. Branch closures have not adversely affected the accessibility of the bank's delivery systems. Services do not vary in a way that inconveniences low- or moderate-income areas or individuals throughout the AAs. The bank provides a relatively high level of community development services.

Retail Banking Services

Delivery systems are generally readily accessible throughout its AAs, and services do not vary in a way that inconveniences low- or moderate-income areas or individuals. The bank provides retail services through its network of branches, drive-up facilities, and ATMs. Hours of operation are reasonable; they vary somewhat across the bank's various markets. During 2020, the bank's hours of operation may have

been impacted by the pandemic. As noted previously, the bank merged with three other financial institutions during the evaluation period, which impacted the bank's total number of branches. The bank also made some changes to the branch network, such as branch openings, relocations, and closures of offices near another office. The changes did not adversely affect residents or LMI geographies given the location of other branches.

Of the bank's total offices, 5.3% are in low-income, 26.0% are in moderate-income, 52.0% are in middle-income, 16.0% are in upper-income, and 0.7% are in unknown-income tracts. Tables illustrating the branches by tract location can be found in the state sections and the full-scope AA sections.

The bank provides alternative delivery systems that include telephone banking, online banking, and mobile banking. Additionally, the bank offers person-to-person payments and bill payment through its online and mobile banking platforms. The bank offers standardized products (with the exception of some loan programs, such as those mentioned in the Innovative and Flexible Practices section of this evaluation) and services throughout its AAs.

Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its AAs. Many bank employees provided financial expertise, such as serving as board members or instructing financial literacy courses, to organizations serving the bank's AAs. Most of the bank's community development services supported organizations that provide community services to LMI individuals. The bank provided community development services in most of its AAs. Additional details are presented in the analysis of each state and full-scope AA.

Community Development Services Benefiting Assessment Areas or a Broader Regional, Statewide, or Multistate Area

Purpose	#
Affordable Housing	57
Community Services	473
Economic Development	37
Revitalize or Stabilize	48
Total	**615**

Since the bank was responsive to the community development needs of its AAs, examiners also considered three community development services that benefited areas outside of the bank's AAs, which focused on community services to LMI and affordable housing.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act, Regulation C – Home Mortgage Disclosure Act, and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.

MONTANA

CRA RATING FOR Montana: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Montana AAs shows excellent responsiveness to local credit needs.
- The lending to businesses of different sizes and to LMI borrowers is good.
- The geographic distribution of loans throughout the AAs is good.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of flexible loan programs in its Montana branches.
- By number and dollar amount, the bank has an excellent level of qualified investments, which exhibits excellent responsiveness to credit and community development needs.
- Bank retail services are readily accessible to businesses and residents throughout the AAs. The bank also provides a relatively high level of community development services in its Montana AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Montana is generally consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Billings MSA and the Bozeman AAs. Examiners weighted the Billings MSA AA more than the Bozeman AA primarily based on lending volume during the evaluation period.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Great Falls MSA, Missoula MSA, Cut Bank, Ennis, Hamilton, Hardin-Miles City, Helena, and Kalispell AAs in Montana. Examiners evaluated whether the bank's performance in the limited scope AAs was consistent with its performance in the full-scope AAs. The limited-scope MSA AAs are compared against the metropolitan full-scope AA. Similarly, nonmetropolitan limited-scope AAs are compared to the nonmetropolitan full-scope AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MONTANA

Assessment Area Information. The bank had 10 AAs in the state for the entirety of the evaluation period. In 2018, the bank had 11 AAs in Montana; however, due to changes in the U.S. OMB MSA delineations, the Absarokee AA became part of the Billings MSA AA in 2019. Besides this modification, the bank did not change the delineation of any Montana AAs and did not add any new Montana AAs since the previous evaluation.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks second among 52 FDIC-insured institutions in Montana, with 17.7% market share of the state's deposits. As of that same date, the bank has $5.1 billion in deposits in Montana, which represent 38.0% of the bank's total deposits.

Five institutions, three regional banks (including First Interstate Bank) and two large national banks, have 70.0% of the deposit market share in the state. The bank operates in a competitive environment in many of its Montana AAs. Most AAs include numerous types of financial institutions, including community banks and large regional and national banks. Credit unions also compete for deposits, as well as loans, in several of the bank's AA. Credit union deposits are not included in the FDIC Deposit Market Share Report.

According to 2020 FFIEC adjusted census data, the Montana AAs included 186 census tracts: four low-, 34 moderate-, 113 middle-, and 35 upper-income tracts.[9] During the evaluation period, 12 nonmetropolitan middle-income tracts in the Montana AAs were classified as underserved and six were classified as distressed.

Population. The total population represented in the bank's Montana AAs is 782,158, or 77.1% of the state's population (1,014,699), according to 2020 FFIEC adjusted census data. Bank management noted that some AAs have experienced continued population growth and that growth intensified in 2020. This intensification is attributed to the pandemic as more people gained the ability to work remotely, desired to have additional outdoor recreation opportunities, and sought the lower cost of living that Montana offers.

2020 FFIEC adjusted census data also shows that 80.7% of the households and 84.1% of the families in the AA live in middle- and upper-income census tracts. Approximately 14.2% of households and 9.5% of families in the AA are below the poverty level. In three counties, Big Horn, Glacier, and Lake, over 20.0% of household are below poverty level. Most (52.1%) residents in the Montana AAs are between the ages of 25 to 64 years old. The remaining age groups are as follows: 22.2% for residents 17 years and younger, 15.5% for residents 65 years and older, and 10.2% for residents aged 18 to 24 years.

General Economic and Housing Information. Economic conditions in the bank's Montana AAs varied by market during the evaluation period. Some of the AAs include urban areas and have diversity in their primary industries, while others are more rural and have less diverse economies or are more dependent on agriculture. The pandemic impacted the AAs to different degrees. Overall, most AAs fared reasonably well through the end of 2020 despite the challenges from the pandemic. Many businesses, including agricultural producers, participated in government programs for monetary assistance to pay employees or offset lost income due to low commodity prices. Despite the impact of the pandemic in 2020, construction and development occurred in some AAs during the evaluation period.

A variety of industries impact Montana's economy. The primary industries in the Montana AAs include agriculture, tourism/hospitality, retail, higher education, government, health care, technology, and energy. Some of the bank's AAs include cities that are regional hubs for obtaining various goods and services. In certain areas, finding workers and adequate workforce housing has been a challenge.

The Montana housing market varies by region. In most areas, however, housing demand and prices have increased and costs to build new homes have also increased. Housing inventory for purchase is at record lows in some areas of the state. These factors contribute to a preexisting housing shortage, including affordable housing, in certain areas. Montana has experienced housing demand from people relocating from out of state; that trend increased in 2020.

According to 2020 FFIEC adjusted census data, in the Montana AAs, 56.6% of the housing was owner-occupied, 28.5% was rental, and 15.0% was vacant. The median housing value was $209,440 for the

[9] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

Montana AAs. The lowest median housing values were in Big Horn and Glacier counties, at $88,500 and $91,300, respectively. Gallatin County had the highest median value at $271,500. In the Montana AAs, the median age of housing stock was 43 years. Gallatin and Madison counties had the newest housing stock at 23 and 24 years, respectively. Custer County had the oldest housing stock age at 52 years.

In many of the Montana AAs, the bank operates in very competitive markets. Various types of financial institutions and creditors operate in the AAs, and as a result, the competition for loans, deposits, and community development activities is typically strong. Aside from the types of financial institutions noted above, in some cases, the bank competes with other entities for loans, such as automobile dealerships and online banks.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MONTANA

Examiners based the bank's Montana evaluation on full-scope reviews of the Billings MSA and Bozeman AAs and limited-scope reviews of the remaining Montana AAs. A detailed discussion of the bank's performance in the full scope AAs and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional data regarding borrower and geographic distributions.

The overall CRA rating for Montana is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests. The ratings below primarily reflect the bank's performance in the full-scope AAs.

The Lending Test rating is high satisfactory. The bank's lending activity reflects excellent responsiveness to credit needs throughout the bank's Montana AAs. The overall distribution of HMDA, consumer, and small business loans by borrower income and revenue size is good. Overall, the geographic distribution of loans is good. The bank also made a relatively high level of community development loans in the Montana AA. The bank extensively used flexible loan programs to help meet credit needs.

The Investment Test rating is outstanding. The bank made an excellent level of qualified investments that show excellent responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. Delivery systems are readily accessible to the geographies of the Montana AAs and to individuals of different income levels. The bank provides a relatively high level of community development services.

LENDING TEST

The Lending Test rating is high satisfactory for Montana.

Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its Montana AAs. The table below shows the bank's lending in its Montana AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the Montana AAs				
Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	8,214	26.5	1,799,371	62.1
Small Business-reportable	8,536	27.6	752,638	26.0
Small Farm-reportable	949	42.9	68,321	9.5
Consumer-optional reportable	13,269	3.1	275,533	2.3
Total Loans	30,968	100.0	2,895,863	100.0

The bank's Montana AAs account for 39.6% by number and 36.3% by amount of the bank's lending activity during the evaluation period. Small business lending increased from 2019 to 2020 due to the bank's PPP lending. In addition, HMDA lending increased from 2019 to 2020, which bank management attributes to increased refinance activity given the interest rate environment.

In many of the Montana AAs, the bank was among the leading lenders for small business and HMDA loans.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the Montana AAs. In addition, the geographic distribution of loans is good. The bank extends loans throughout its AAs, including in low- and moderate-income tracts.

During the evaluation period, the bank extensively used flexible loan programs totaling approximately $388.6 million in its Montana AAs (primarily including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Billings MSA and Bozeman AAs. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

Community Development Loans

The bank made a relatively high level of community development loans in the Montana AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. As shown in the table at right, the bank originated or renewed 28 community development loans totaling $86.0 million in its AAs.

Montana Community Development Loans		
Purpose	*#*	*$*
Affordable Housing	17	31,784,116
Community Service	2	1,220,000
Economic Development	3	12,961,377
Revitalize or Stabilize	6	39,991,169
Total	**28**	**85,956,662**

The bank's community development lending benefited the Billings MSA, Great Falls MSA, Missoula MSA, Bozeman, Hamilton, Hardin-Miles City,

and Kalispell AAs. By number, the bank had the most loans in the Missoula MSA and Bozeman AAs. By dollar, the bank had the most lending in the Bozeman AA. The bank's community development loan dollars primarily supported revitalization or stabilization in LMI tracts or distressed or underserved middle-income tracts and affordable housing. Three of the affordable housing loans ($7.9 million) were related to LIHTC projects. The bank's community development lending is responsive to AA needs. The bank also made a $500,000 loan that had a statewide impact, including in the bank's AAs.

Given this responsiveness, examiners can also consider any qualified community development loans benefitting geographies outside the bank's Montana AAs. The bank originated two community development loans, totaling $4.2 million, outside the bank's Montana AAs. These loans supported economic development and affordable housing initiatives. The table above does not include these loans.

INVESTMENT TEST

The bank's Investment Test rating is outstanding for Montana. This conclusion primarily reflects the bank's performance in the full-scope AAs. The bank has an excellent level of qualified investments in the form of securities and donations that show excellent responsiveness to credit and community development needs.

During the evaluation period, the bank made an excellent level of qualified investments. The bank made three new investments, two in the Bozeman AA and one in the Billings MSA AA, totaling $16.1 million. Two investments promote affordable housing, including one $7.6 investment in a LIHTC project and one $4.8 million purchase of LMI multifamily housing MBS. Affordable housing is a critical need in the AAs (Billings MSA and Bozeman). The remaining $3.7 million investment in a NMTC project promotes economic development. The bank also has 44 prior-period investments totaling $42.6 million. Of the prior-period activity, 25 investments totaling $40.1 million benefited its Montana AAs and 19 investments totaling $2.5 million benefited the state of Montana.

Given this responsiveness, examiners can also consider any qualified community development investments benefiting geographies outside the bank's Montana AAs. The bank invested $2.1 million in a NMTC project with an economic development purpose that was outside the bank's Montana AAs. The bank also has 10 prior-period investments totaling $6.4 million that benefit Montana geographies outside of its AAs.

Donations. The bank made an excellent level of donations during the evaluation period. Most donations ($1,221,330) directly benefited the bank's Montana AAs. Additional donations in the amount of $200,714 benefited regional and statewide areas that include the bank's AAs. The following table shows the distribution of bank donations by AA, as well as at the regional and statewide levels.

Montana Qualified Investment Donations		
Assessment Area	**Total**	
	#	**$**
Billings MSA	377	609,228
Bozeman	117	103,357
Cut Bank	1	470
Ennis	6	10,250
Great Falls MSA	73	115,043
Hamilton	4	30,500

Montana Qualified Investment Donations		
Assessment Area	Total	
	#	$
Hardin-Miles City	39	65,163
Helena	35	52,310
Kalispell	45	20,200
Missoula MSA	165	211,708
Absarokee (2018 only)	2	3,000
Regional Montana	38	62,175
State of Montana	45	138,539
Total	947	1,421,944

By number and dollar, the bank made most donations in the Billings MSA AA. The bank made donations in each Montana AA. Overall, most of the donations were made to organizations that provide community services to LMI individuals. For example, the bank supported food shelves and meal programs, youth and family programs, emergency housing, and health care-related causes, which all focused on serving LMI individuals. The bank's donations that provided meals to individuals in need during the pandemic are especially noteworthy given the prevalence of food insecurity. The bank also made donations that promoted affordable housing (a notable concern in Montana), promoted economic development, and helped revitalize or stabilize certain geographies. Overall, the bank's donations show excellent responsiveness to identified community needs.

Given this responsiveness, examiners can also consider any qualified community development donations benefiting geographies outside the bank's Montana AAs. The bank made five donations totaling $1,850 to organizations providing community services to LMI individuals. The table above does not include these donations.

SERVICE TEST

The Service Test rating is high satisfactory for Montana. This conclusion primarily reflects the bank's performance in the full-scope AAs. Delivery systems are readily accessible to the residents of the Montana AAs. The bank's changes to its branches and ATMs during the evaluation period did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences certain people or areas. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Finally, the bank provided a relatively high level of community development services in the Montana AAs.

Retail Banking Services

The bank's delivery systems are readily accessible to residents and businesses throughout the bank's Montana AAs. At the time of the evaluation, the bank operated 45 offices (including two separate drive-up facilities) in the state; nearly all branches have drive-ups and at least one ATM. The bank also operates stand-alone ATMs in Montana. Most offices offer weekend and/or extended hours. The following table shows the bank's distribution of branches and drive-up facilities as of 2020.

Geographic Distribution of Branches
State of Montana

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**2**	**4.4%**	**0**	**0**	**1**	**2**	**0**				
	DTO	0		0	0	0			4	2.2%	1.7%	2.4%
	LS	0		0	0							
Moderate	**Total**	**12**	**26.7%**	**0**	**0**	**11**	**11**	**7**				
	DTO	1		0	0	1			34	18.3%	17.6%	18.2%
	LS	0		0	0							
Middle	**Total**	**24**	**53.3%**	**0**	**1**	**22**	**21**	**7**				
	DTO	1		0	0	1			113	60.8%	59.3%	57.2%
	LS	0		0	0							
Upper	**Total**	**7**	**15.6%**	**0**	**0**	**6**	**5**	**2**				
	DTO	0		0	0	0			35	18.8%	21.4%	22.3%
	LS	1		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**45**	**100.0%**	**0**	**1**	**40**	**39**	**16**				
	DTO	2		0	0	2			186	100.0%	100.0%	100.0%
	LS	1		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, overall, the bank has 4.4% and 26.7% of its branches in low- and moderate-income census tracts, respectively. Similarly, 3.8% and 26.4% of its ATM are in low- and moderate-income census tracts, respectively. The percentages of the bank's branches and ATMs in low-income tracts are consistent with demographics, which show that 2.2% of the AA census tracts are low income. The percentages of the bank's branches and ATMs in moderate-income tracts exceed demographics; 18.2% of all census tracts are moderate income.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank provides a relatively high level of community development services in its Montana AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. The bank provided community development services in all Montana AAs except the Cut Bank AA (a rural market). Most of the services were in the Billings MSA, Missoula MSA, Hardin-Miles City, and Kalispell AAs. In addition, 33 services impacted a broader regional or statewide area of Montana. The table below shows the distribution of community development services by type of activity and AA.

Montana Community Development Services					
Assessment Area	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize or Stabilize***	***Total***
Billings MSA	4	40	0	9	53
Bozeman	1	5	1	0	7
Ennis	0	1	0	0	1
Great Falls MSA	0	10	0	0	10
Hamilton	0	0	1	1	2
Hardin-Miles City	4	12	1	5	22
Helena	1	4	0	0	5
Kalispell	0	15	3	0	18
Missoula MSA	6	22	3	1	32
Absarokee (2018 only)	0	0	0	1	1
Regional Montana	0	16	3	1	20
State of Montana	4	9	0	0	13
Totals	**20**	**134**	**12**	**18**	**184**

Numerous employees devoted time to providing financial expertise to organizations that support various community development initiatives. Employees often served in leadership roles, such as board members. Employees were also active in providing financial education. Most of the employees' activities related to supporting community services for LMI individuals. Examples of the services provided by the organizations to LMI individuals include rent and utility assistance, food assistance, personal finance training, and job interview training and support. Bank employees also provided services that helped to revitalize or stabilize moderate-income tracts or tracts classified as distressed or underserved and helped to promote affordable housing and economic development. Affordable housing is a concern in numerous areas of the state. The bank's services are responsive to the community development needs in the AAs.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BILLINGS, MONTANA, MSA ASSESSMENT AREA

Bank Information. The bank operates 10 full-service branches in the Billings MSA AA. All branches have drive-up facilities. Two of the branches, located in Absarokee and Columbus, were in the bank's Absarokee AA during 2018. In 2018, the OMB changed the Billings MSA boundary delineations, and Stillwater County, which includes the towns of Absarokee and Columbus, became part of the Billings MSA AA. The bank also operates cash-dispensing-only and deposit-taking ATMs in the AA. By number, the bank has 6.6% of its branches and drive-up facilities in this AA. Refer to the Institution section of this evaluation for details on the bank's delivery services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked first among 12 FDIC-insured institutions operating in the Billings MSA, with a 25.1% deposit market share and $1.6 billion in deposits. The deposits in this AA represent 11.6% of the bank's overall deposits. The bank competes with various types of financial institutions locally, including several community banks, regional banks, and large national banks.

Assessment Area Information. The Billings MSA AA is in south-central Montana and includes the entire Billings MSA. In 2019 and 2020, the Billings MSA included Yellowstone, Carbon, and Stillwater counties. In 2018, the MSA included Yellowstone, Carbon, and Golden Valley counties. As noted previously, the 2018 OMB changes impacted the Billings MSA boundaries; Golden Valley County was removed from the MSA, and Stillwater County was added to the MSA. Given the change in the AA due to MSA boundary changes, the census tract composition of the AA changed. In 2018, the Billings MSA AA had one low-, 10 moderate-, 22 middle-, and five upper-income census tracts. The AA now has one low-, nine moderate-, 24 middle-, and six upper-income census tracts.

The Billings MSA AA is geographically diverse and includes rural areas, agricultural land, national forests, and more urban areas. A small portion of the Crow Indian Reservation is in the AA. The Hardin-Miles City AA includes a larger portion of the reservation, which primarily is in Big Horn County.

The following Combined Demographics Report provides demographic information, including the census tract composition for 2019 and 2020, for this AA, based on 2020 FFIEC adjusted census data and 2020 D& B data.[10]

[10]The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects OMB revised MSA delineations as applicable.

Combined Demographics Report

2020 Billings MSA AA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.5	838	1.9	169	20.2	8,571	19.5
Moderate	9	22.5	7,468	17.0	1,143	15.3	7,934	18.0
Middle	24	60.0	27,685	62.9	1,909	6.9	9,620	21.9
Upper	6	15.0	8,015	18.2	254	3.2	17,881	40.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**40**	**100.0**	**44,006**	**100.0**	**3,475**	**7.9**	**44,006**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,635	510	1.1	31.2	996	60.9	129	7.9
Moderate	16,581	8,417	17.4	50.8	6,929	41.8	1,235	7.4
Middle	46,703	30,267	62.6	64.8	11,098	23.8	5,338	11.4
Upper	12,163	9,169	19.0	75.4	2,278	18.7	716	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**77,082**	**48,363**	**100.0**	**62.7**	**21,301**	**27.6**	**7,418**	**9.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	249	2.3	210	2.2	39	4.9	0	0.0
Moderate	3,011	28.3	2,677	27.5	310	39.0	24	26.1
Middle	5,912	55.6	5,450	55.9	404	50.8	58	63.0
Upper	1,465	13.8	1,413	14.5	42	5.3	10	10.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10,637**	**100.0**	**9,750**	**100.0**	**795**	**100.0**	**92**	**100.0**
Percentage of Total Businesses:				**91.7**		**7.5**		**0.9**

Combined Demographics Report								
2020 Billings MSA AA								
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	51	9.7	50	9.8	0	0.0	1	33.3
Middle	361	68.9	353	69.2	7	63.6	1	33.3
Upper	111	21.2	106	20.8	4	36.4	1	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**524**	**100.0**	**510**	**100.0**	**11**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**97.3**		**2.1**		**0.6**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Billings MSA, for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Billings MSA					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$71,000**	0 - $35,549	$35,500 - $56,799	$56,800 - $85,199	$85,200 - & above
2019	**$73,700**	0 - $36,849	$36,850 - $58,959	$58,960 - $88,439	$88,440 - & above
2020	**$76,400**	0 - $38,199	$38,200 - $61,119	$61,120 - $91,679	$91,680 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Billings MSA, which was $66,980 for 2018 and $66,565 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 173,248. Approximately 88.7% of the AA population resides in Yellowstone County. The majority (52.9%) of the population is between 25 to 64 years of age. Individuals 17 years or younger comprise 23.2% of the population, and 15.6% of the population is 65 years and older.

Housing Information. According to 2020 FFIEC adjusted census data, the AA has 77,082 housing units: 62.7% are owner-occupied, 27.6% are rental units, and 9.6% are vacant. The median age of the housing

stock is 45 years, which is somewhat higher than the statewide median age of 39 years. The median housing value is $194,126, and the affordability ratio of 27.4 is higher compared to 24.4 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

According to bank management, the median sales price was approximately $280,000 and had an increasing trend during the evaluation period. Homeownership for low- and moderate-income residents in this AA can be hard to achieve due to prices and limited availability of affordable homes. While housing is more affordable in certain rural areas of the AA, generally the inventory of homes for purchase throughout the AA is low and prices continue to increase. Growth in the health care industry has increased housing demand. Bank management and a community contact noted the housing shortage makes it challenging to recruit workers in certain areas. Generally, there is a shortage of affordable housing in the AA, which includes workforce housing.

The table below shows the housing cost burden for renters and owners by geography and income level. As reflected in the table, individuals in the low-income bracket and some in the moderate-income have a higher housing cost burden. Overall, the cost burden for renters and homeowners in the AA is generally similar to the state.

Billings MSA Housing Cost Burden

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Billings MSA	77%	30%	40%	60%	35%	19%
Carbon County, MT	72%	32%	36%	57%	22%	20%
Stillwater County, MT	58%	24%	26%	48%	32%	18%
Yellowstone County, MT	78%	31%	41%	61%	36%	20%
Montana	71%	29%	39%	56%	33%	20%

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

General Economic and Business Information. According to bank management and a community contact, the local economy experienced steady, modest growth during the evaluation period. The Billings MSA has a diverse economy and is a regional hub for surrounding communities in south central Montana. The area provides access to health care, education, banking, entertainment (such as concerts and sports tournaments), transportation, and retail stores. The AA economy is significantly impacted by agriculture, energy, retail, education, health care, hospitality, and tourism. Major local employers include health care facilities, county government, mining- and other energy-related companies, local school districts, higher education facilities, retailers, and financial institutions. According to a community contact, the health care system has been the fastest growing source of jobs and serves patients from a broad region. Agricultural activity in the AA primarily occurs in Carbon and Stillwater counties, as well as some activity east of Billings. According to a community contact, agricultural products include crops such as sugar beets, barley, wheat, corn, and alfalfa, as well as livestock. Tourism is significant in areas of the AA given the accessible outdoor recreation, such as skiing and fishing, as well as the proximity to Yellowstone National Park. During the evaluation period, residential and commercial construction and development occurred, which included the start of the Billings Logan International Airport terminal expansion project. According to a community contact, the start of the pandemic slowed construction and development in the area.

Overall, the area fared well during the evaluation period despite the ongoing pandemic. Bank management stated that there were no significant business closures. Some local businesses, most notably hospitality-related and small retail businesses, experienced a downturn because of the pandemic. During 2020, local health care facilities faced significant strain trying to serve patients (many of whom were from outside of the AA). Tourism-related businesses struggled during part of 2020 as lodging vacancy rates were higher than normal. Many area businesses, including those in the hospitality industry, relied on PPP loans to help sustain operations and pay employees. Tourism in the area increased in the latter part of 2020, despite the pandemic, as people sought outdoor recreation and chose to travel by cars or other recreational vehicles. During the evaluation period, the AA had continued development, including construction of various commercial and multifamily projects and expansion of medical facilities. Lastly, the agricultural economy has been impacted by price variation, which has mostly trended down.

The annual average unemployment rate for the AA was relatively consistent with the rate for the state during the evaluation period. The increase in the annual average unemployment rates during 2020 was a result of the pandemic, and, according to a community contact, unemployment did not stay at higher levels for long. The following table provides the annual average unemployment rates for the AA, counties in the AA, and the state of Montana.

Annual Average Unemployment Rates			
Area	**2018**	**2019**	**2020**
Billings MSA AA	3.38%	3.32%	5.45%
Carbon County, MT	3.56%	3.59%	6.00%
Stillwater County, MT	3.46%	3.22%	5.06%
Yellowstone County, MT	3.37%	3.30%	5.44%
Montana	3.77%	3.60%	5.89%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BILLINGS MSA

The bank's Lending Test performance in the Billings AA is good. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. Overall, the geographic distribution of loans is also good. The bank makes a relatively high level of community development loans. The bank extensively uses flexible loan programs to help meet credit needs in the AA. Examiners assigned equal weight to HMDA, consumer, and small business loans based on the total number and dollar volume of loans during the evaluation period. Examiners did not include the bank's small farm lending in the analysis based on the comparison of agricultural loan volume in this AA to the volume of other loan products.

The Investment Test performance in this AA is excellent. The bank made an excellent level of qualified investments, including donations, that show excellent responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any individuals or areas. Bank officers and employees provide a relatively high level of community development services.

LENDING TEST

The bank's Lending Test performance in the Billings AA is good.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. The bank's HMDA and small business loan market share was similar in 2019 and 2020. For HMDA loans, the bank ranked second in the market among 199 lenders reporting HMDA loans in 2019 and 220 lenders in 2020. The bank's market share of HMDA lending averaged 7.9% for those two years. The bank ranked fourth in the market among 65 lenders reporting CRA data in 2019 and 75 lenders in 2020. The bank's average market share for CRA-reportable loans for those two years was 7.9%. During the evaluation period, lending activity in this AA represented 9.3% by number of loans and 8.1% by dollar amount of loans the bank's total lending. Within the Montana AAs, the lending activity in the Billings MSA AA was 23.2% by number of loans and 22.0% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. At the product level, examiners evaluated home purchase, refinance, and home improvement loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Billings MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	11	3.4	4.9	1,194	1.6	2.7	20	6.9	6.1	2,774	4.1	3.5	19.5
Moderate	50	15.5	19.3	8,743	12.1	14.8	59	20.5	21.3	10,510	15.4	16.7	18.0
Middle	92	28.6	25.5	18,952	26.2	24.0	65	22.6	24.5	15,087	22.1	23.3	21.9
Upper	129	40.1	33.3	35,122	48.5	41.3	107	37.2	34.3	31,870	46.6	42.9	40.6
Unknown	40	12.4	16.9	8,458	11.7	17.2	37	12.8	13.8	8,116	11.9	13.5	0.0
Total	322	100.0	100.0	72,469	100.0	100.0	288	100.0	100.0	68,357	100.0	100.0	100.0
Refinance Loans													
Low	9	5.7	7.5	922	3.4	3.9	20	4.5	3.5	2,251	2.3	1.8	19.5
Moderate	27	17.1	14.6	3,896	14.3	10.8	68	15.1	13.2	9,923	10.1	9.4	18.0
Middle	36	22.8	20.4	5,447	20.1	18.2	99	22.0	18.8	20,020	20.4	16.2	21.9
Upper	63	39.9	36.3	12,727	46.9	43.0	190	42.3	41.5	49,397	50.4	48.8	40.6
Unknown	23	14.6	21.2	4,166	15.3	24.2	72	16.0	23.0	16,322	16.7	23.8	0.0
Total	158	100.0	100.0	27,158	100.0	100.0	449	100.0	100.0	97,913	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Billings MSA

Home Improvement Loans													
Low	4	6.7	6.9	165	3.3	5.4	3	5.4	8.1	229	3.7	6.3	19.5
Moderate	4	6.7	10.1	292	5.8	7.5	10	17.9	14.3	756	12.2	9.5	18.0
Middle	11	18.3	19.7	713	14.2	13.2	14	25.0	20.6	1,213	19.6	17.1	21.9
Upper	33	55.0	52.3	2,920	58.3	57.7	21	37.5	45.7	3,176	51.4	54.6	40.6
Unknown	8	13.3	11.0	919	18.3	16.3	8	14.3	11.2	810	13.1	12.6	0.0
Total	60	100.0	100.0	5,009	100.0	100.0	56	100.0	100.0	6,184	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	26	4.4	5.9	2,361	2.2	3.1	45	5.5	4.5	5,324	3.1	2.5	19.5
Moderate	84	14.3	16.9	13,121	12.1	13.2	143	17.4	16.2	21,591	12.4	12.3	18.0
Middle	157	26.7	23.3	26,325	24.4	21.7	186	22.7	20.8	36,821	21.1	18.9	21.9
Upper	245	41.7	35.5	52,593	48.7	42.1	326	39.8	38.5	85,044	48.8	46.0	40.6
Unknown	75	12.8	18.4	13,693	12.7	19.9	120	14.6	20.1	25,465	14.6	20.2	0.0
Total	587	100.0	100.0	108,093	100.0	100.0	820	100.0	100.0	174,245	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Billings MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	4.5	4.3	80	2.7	2.4	2	7.7	3.0	70	4.3	1.3	19.5
Moderate	3	6.8	10.6	190	6.5	5.2	6	23.1	12.9	402	24.5	11.0	18.0
Middle	17	38.6	23.1	1,028	35.3	19.9	8	30.8	21.3	501	30.5	16.1	21.9
Upper	19	43.2	58.7	1,491	51.2	70.9	8	30.8	57.9	601	36.6	65.8	40.6
Unknown	3	6.8	3.4	125	4.3	1.6	2	7.7	5.0	70	4.3	5.9	0.0
Total	44	100.0	100.0	2,914	100.0	100.0	26	100.0	100.0	1,644	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.3	0	0.0	5.5	0	0.0	2.8	0	0.0	1.2	19.5
Moderate	0	0.0	9.3	0	0.0	7.4	0	0.0	13.9	0	0.0	13.8	18.0
Middle	1	33.3	23.7	185	34.1	22.3	0	0.0	20.8	0	0.0	11.8	21.9
Upper	1	33.3	50.5	333	61.3	47.5	0	0.0	45.8	0	0.0	43.2	40.6
Unknown	1	33.3	7.2	25	4.6	17.2	0	0.0	16.7	0	0.0	30.0	0.0
Total	3	100.0	100.0	543	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Billings MSA

Purpose Not Applicable													
Low	0	0.0	2.6	0	0.0	1.8	0	0.0	0.0	0	0.0	0.0	19.5
Moderate	0	0.0	5.1	0	0.0	3.8	0	0.0	0.5	1	0.7	0.4	18.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	3.8	0	0.0	7.5	0	0.0	0.0	0	0.0	0.0	40.6
Unknown	0	0.0	88.5	0	0.0	86.9	1	100.0	99.5	0	0.0	99.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	147	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Based on 2019 and 2020 FFIEC adjusted census data, 19.5% of the families in the AA are low income and 18.0% are moderate income. In 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics and comparable to aggregate lenders. For those same years, the bank's overall lending to moderate-income borrowers was comparable to aggregate and slightly below demographics. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as affordability factors. The bank was second among several leading HMDA reporters in both 2019 and 2020. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, regional banks, and large national banks.

Home prices in the AA may be difficult for LMI borrowers to afford based on an assumption that a borrower can obtain a loan for approximately three times the borrower's annual income. Using the 2020 FFIEC estimated median family income of $76,400 for the Billings MSA, an individual with the highest income in the low-income bracket ($38,199) could afford a $114,597 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($61,119) could afford a $183,357 home. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $193,451. As previously mentioned, bank management noted the median sales price increased during the evaluation period and estimated the price to be approximately $280,000. This data suggests that homeownership would not be affordable for many low-income and some moderate-income borrowers. As mentioned earlier, bank management and a community contact noted a shortage of affordable housing.

In this AA, the bank made extensive use of flexible lending programs to assist meeting the credit needs of LMI borrowers. The bank participated in several programs, including MBOH, Fannie Mae HomeReady, NeighborWorks, City of Billings First-Time Home Buyer Program, and MoFi HomeNow, which help LMI borrowers (including first-time homebuyers) achieve homeownership. Some programs include closing cost and down payment assistance. The bank also made FHA and VA loans. During the evaluation period, the bank made a total of $61.3 million in loans through these programs, which is noteworthy given housing affordability issues. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 HMDA lending was generally consistent with its 2019 and 2020 consumer lending.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Billings MSA								
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	8	1.5%	161	1.2%	46	8.3%	739	5.3%
Moderate	68	12.3%	1,435	10.3%	80	14.5%	1,524	11.0%
Low/Moderate Total	76	13.8%	1,596	11.5%	126	22.9%	2,263	16.3%
Middle	378	68.6%	10,059	72.4%	160	29.0%	3,817	27.5%
Upper	97	17.6%	2,243	16.1%	257	46.6%	7,608	54.7%
Unknown	0	0.0%	0	0.0%	8	1.5%	210	1.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	551	100.0%	13,898	100.0%	551	100.0%	13,898	100.0%
	Other – Secured							
Low	5	2.3%	118	2.1%	19	8.8%	400	7.0%
Moderate	23	10.6%	337	5.9%	28	13.0%	475	8.3%
Low/Moderate Total	28	13.0%	455	7.9%	47	21.8%	875	15.2%
Middle	156	72.2%	4,144	72.1%	54	25.0%	1,457	25.4%
Upper	32	14.8%	1,146	19.9%	106	49.1%	3,299	57.4%
Unknown	0	0.0%	0	0.0%	9	4.2%	114	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	216	100.0%	5,745	100.0%	216	100.0%	5,745	100.0%
	Other – Unsecured							
Low	1	0.5%	3	0.1%	30	16.2%	228	8.9%
Moderate	28	15.1%	355	13.9%	43	23.2%	404	15.9%
Low/Moderate Total	29	15.7%	358	14.1%	73	39.5%	632	24.8%
Middle	127	68.6%	1,790	70.3%	44	23.8%	611	24.0%
Upper	29	15.7%	400	15.7%	52	28.1%	1,121	44.0%
Unknown	0	0.0%	0	0.0%	16	8.6%	184	7.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	185	100.0%	2,548	100.0%	185	100.0%	2,548	100.0%
	Consumer Loan Totals							
Low	14	1.5%	282	1.3%	95	10.0%	1,367	6.2%
Moderate	119	12.5%	2,127	9.6%	151	15.9%	2,403	10.8%
Low/Moderate Total	133	14.0%	2,409	10.9%	246	25.8%	3,770	17.0%
Middle	661	69.4%	15,993	72.1%	258	27.1%	5,885	26.5%
Upper	158	16.6%	3,789	17.1%	415	43.6%	12,028	54.2%
Unknown	0	0.0%	0	0.0%	33	3.5%	508	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	952	100.0%	22,191	100.0%	952	100.0%	22,191	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Billings MSA								
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	4	1.0%	74	0.7%	46	11.0%	911	8.1%
Moderate	55	13.2%	1,418	12.6%	71	17.0%	1,549	13.8%
Low/Moderate Total	59	14.1%	1,492	13.3%	117	28.0%	2,460	21.9%
Middle	275	65.8%	7,500	66.8%	94	22.5%	2,274	20.2%
Upper	84	20.1%	2,243	20.0%	200	47.8%	6,381	56.8%
Unknown	0	0.0%	0	0.0%	7	1.7%	120	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	418	100.0%	11,235	100.0%	418	100.0%	11,235	100.0%
	Other – Secured							
Low	1	0.4%	19	0.3%	16	6.2%	242	3.2%
Moderate	29	11.2%	694	9.3%	40	15.4%	960	12.9%
Low/Moderate Total	30	11.5%	713	9.6%	56	21.5%	1,202	16.1%
Middle	181	69.6%	5,392	72.3%	65	25.0%	1,877	25.2%
Upper	49	18.8%	1,354	18.2%	129	49.6%	4,200	56.3%
Unknown	0	0.0%	0	0.0%	10	3.8%	180	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	260	100.0%	7,459	100.0%	260	100.0%	7,459	100.0%
	Other – Unsecured							
Low	0	0.0%	0	0.0%	25	18.8%	334	13.8%
Moderate	21	15.8%	211	8.7%	22	16.5%	229	9.4%
Low/Moderate Total	21	15.8%	211	8.7%	47	35.3%	563	23.2%
Middle	91	68.4%	1,653	68.2%	30	22.6%	521	21.5%
Upper	21	15.8%	561	23.1%	45	33.8%	1,118	46.1%
Unknown	0	0.0%	0	0.0%	11	8.3%	223	9.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	2,425	100.0%	133	100.0%	2,425	100.0%
	Consumer Loan Totals							
Low	5	0.6%	93	0.4%	87	10.7%	1,487	7.0%
Moderate	105	12.9%	2,323	11.0%	133	16.4%	2,738	13.0%
Low/Moderate Total	110	13.6%	2,416	11.4%	220	27.1%	4,225	20.0%
Middle	547	67.4%	14,545	68.9%	189	23.3%	4,672	22.1%
Upper	154	19.0%	4,158	19.7%	374	46.1%	11,699	55.4%
Unknown	0	0.0%	0	0.0%	28	3.5%	523	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	811	100.0%	21,119	100.0%	811	100.0%	21,119	100.0%

According to 2019 and 2020 FFIEC adjusted census data, 23.7% of the households in the AA are low income and 16.5% are moderate income. For 2019 and 2020, the bank's overall lending to low-income

borrowers was below demographics and was comparable to demographics for lending to moderate-income borrowers. The bank's borrower distribution of loans is reasonable given the strong banking competition in the AA. Consumers have numerous banking options.

The bank continues to originate small-dollar consumer loans. The bank originated 8.1% of all consumer loans in the AA for $3,000 or less. Of these small-dollar consumer loans, approximately 86.4% were to LMI borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the LMI borrowers in the AA.

Lastly, the bank's 2018 consumer lending was generally consistent with its 2019 and 2020 consumer lending.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Billings MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	174	41.8	47.0	14,274	35.4	41.9	227	22.9	49.2	14,253	19.3	34.3	91.7
Over $1 Million	201	48.3		23,551	58.4		190	19.2		19,352	26.2		7.5
Revenue Unknown	41	9.9		2,482	6.2		573	57.9		40,177	54.5		0.9
Total	416	100.0		40,307	100.0		990	100.0		73,782	100.0		100.0
By Loan Size													
$100,000 or Less	330	79.3	91.7	11,007	27.3	36.1	819	82.7	84.8	24,472	33.2	29.3	
$100,001 - $250,000	42	10.1	4.6	6,670	16.5	17.6	95	9.6	8.7	15,012	20.3	22.0	
$250,001 - $1 Million	44	10.6	3.8	22,630	56.1	46.2	76	7.7	6.5	34,298	46.5	48.7	
Total	416	100.0	100.0	40,307	100.0	100.0	990	100.0	100.0	73,782	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	142	81.6		4,245	29.7		196	86.3		5,303	37.2		
$100,001 - $250,000	14	8.0		2,075	14.5		14	6.2		2,115	14.8		
$250,001 - $1 Million	18	10.3		7,954	55.7		17	7.5		6,835	48.0		
Total	174	100.0		14,274	100.0		227	100.0		14,253	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

According to 2019 and 2020 D&B data, 91.6% and 91.7% of businesses in the AA had gross annual revenues of $1 million or less, respectively. The bank's lending to small businesses was below aggregate lenders' activity in 2019 and 2020. For both years, the bank's and aggregate lenders' lending activity was below demographic data. In 2019 and 2020, the bank made 81.6% and 86.3%, respectively, of its small business loans to small entities in amounts of $100,000 or less. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less in 2019 but was comparable to aggregate lenders' activity in 2020. Originating loans for less than $100,000 indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with numerous financial institutions for small business loans, including regional banks and large national banks, as well as national credit card lenders.

The bank's lending to businesses with unknown revenues increased significantly from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program. These loans were designed to help businesses keep their workforces employed during the coronavirus pandemic. In this AA, the bank's originated over 600 PPP loans in amounts of $1 million or less. Of those PPP loans, more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

In addition to PPP loans, the bank also originated approximately $100,000 in loans through another SBA loan program. During the evaluation period, the bank made loans totaling over $44.6 million through these programs. For more information on flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 small business lending was generally consistent with its 2019 small business lending.

Geographic Distribution

Overall, the bank's geographic distribution of loans reflects good dispersion among census tracts of different income levels and does not reveal any unexplained gaps in lending. The AA has one low-income and nine moderate-income census tracts. In addition, the AA includes 24 middle-income tracts, which represent 60.0% of tracts in the AA, and six upper-income tracts.

Residential Real Estate. The geographic distribution of HMDA loans is good. The tables below display the distribution of the bank's 2019 and 2020 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Billings MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	0.6	0.9	199	0.3	0.5	3	1.0	1.1	367	0.5	0.6	1.1
Moderate	42	13.0	13.4	7,015	9.7	10.4	31	10.8	12.8	5,812	8.5	9.7	17.4

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2) Assessment Area: Billings MSA													
Middle	201	62.4	65.7	45,039	62.1	65.0	190	66.0	66.2	45,502	66.6	66.9	62.6
Upper	77	23.9	20.0	20,216	27.9	24.0	64	22.2	19.8	16,676	24.4	22.7	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	322	100.0	100.0	72,469	100.0	100.0	288	100.0	100.0	68,357	100.0	100.0	100.0
Refinance Loans													
Low	1	0.6	0.7	200	0.7	0.3	2	0.4	0.5	215	0.2	0.2	1.1
Moderate	24	15.2	12.6	2,758	10.2	9.0	44	9.8	10.7	7,734	7.9	8.4	17.4
Middle	106	67.1	66.0	18,738	69.0	67.0	290	64.6	63.9	63,204	64.6	63.4	62.6
Upper	27	17.1	20.7	5,462	20.1	23.7	113	25.2	24.9	26,760	27.3	27.9	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	158	100.0	100.0	27,158	100.0	100.0	449	100.0	100.0	97,913	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.4	0	0.0	0.6	1	1.8	0.9	50	0.8	0.7	1.1
Moderate	10	16.7	15.1	474	9.5	12.1	2	3.6	13.0	190	3.1	9.5	17.4
Middle	40	66.7	61.0	3,796	75.8	60.2	39	69.6	61.0	4,788	77.4	63.4	62.6
Upper	10	16.7	22.5	739	14.8	27.2	14	25.0	25.1	1,156	18.7	26.5	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	60	100.0	100.0	5,009	100.0	100.0	56	100.0	100.0	6,184	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	16.7	3.6	1,119	17.0	2.8	1	11.1	8.5	170	2.1	0.8	4.8
Moderate	0	0.0	35.7	0	0.0	64.3	1	11.1	38.3	300	3.8	62.6	39.5
Middle	5	83.3	53.6	5,447	83.0	20.1	6	66.7	51.1	3,846	48.6	33.4	42.2
Upper	0	0.0	7.1	0	0.0	12.9	1	11.1	2.1	3,600	45.5	3.2	13.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	6,566	100.0	100.0	9	100.0	100.0	7,916	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	4	0.7	1.0	1,518	1.3	0.5	7	0.8	0.8	802	0.4	0.4	1.1
Moderate	82	13.8	13.2	10,780	9.4	11.4	81	9.8	11.8	14,166	7.8	11.2	17.4
Middle	387	65.3	65.5	75,654	66.0	64.4	541	65.3	64.7	118,541	65.1	63.6	62.6
Upper	120	20.2	20.3	26,707	23.3	23.7	200	24.1	22.8	48,652	26.7	24.8	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	593	100.0	100.0	114,659	100.0	100.0	829	100.0	100.0	182,161	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2)
Assessment Area: Billings MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.5	0	0.0	0.1	0	0.0	1.0	0	0.0	1.3	1.1
Moderate	5	11.4	9.1	200	6.9	5.8	3	11.5	8.4	130	7.9	6.4	17.4
Middle	33	75.0	63.9	2,424	83.2	59.3	15	57.7	60.9	1,054	64.1	58.4	62.6
Upper	6	13.6	26.4	290	10.0	34.8	8	30.8	29.7	460	28.0	33.8	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	44	100.0	100.0	2,914	100.0	100.0	26	100.0	100.0	1,644	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.1	0	0.0	2.2	0	0.0	1.4	0	0.0	0.7	1.1
Moderate	1	33.3	12.4	333	61.3	9.1	0	0.0	15.3	0	0.0	20.6	17.4
Middle	2	66.7	58.8	210	38.7	61.6	0	0.0	62.5	0	0.0	44.9	62.6
Upper	0	0.0	24.7	0	0.0	27.1	0	0.0	20.8	0	0.0	33.8	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	543	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.8	0	0.0	0.9	0	0.0	0.5	0	0.0	0.2	1.1
Moderate	0	0.0	23.1	0	0.0	18.1	0	0.0	15.4	0	0.0	10.8	17.4
Middle	0	0.0	66.7	0	0.0	73.5	1	100.0	69.8	147	100.0	72.1	62.6
Upper	0	0.0	6.4	0	0.0	7.5	0	0.0	14.3	0	0.0	16.8	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	147	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank extended HMDA loans in each of the low- and moderate-income census tracts, as well as the other tracts in the AA. In 2019, the bank extended 0.7% and 13.8% of its HMDA loans in the low-income tract and the moderate-income tracts, respectively. In 2020, the bank extended 0.8% and 9.8% of its HMDA loans in the low-income tract and the moderate-income tracts, respectively. The bank's lending in the low-income tract is comparable to the tract's demographic, which shows that 1.1% of owner-occupied units and 1.9% of families are in the tract. According to 2020 FFIEC adjusted census data, most housing units in the low-income tract are rentals (60.9%) or vacant (7.9%). The bank's lending in the moderate-income tracts is slightly below the tracts' demographics that show 17.4% of owner-occupied units and 17.0% of families are in these tracts. According to 2020 FFIEC adjusted census data, 41.8% of housing units are rentals and 7.9% of housing units are vacant in the moderate-income tracts. The bank's performance is comparable to aggregate lenders' performance.

Although the bank's lending in the moderate-income tracts is below demographics for both years, the bank's overall performance is reasonable given aggregate lenders' performance, demographics, and competition. One moderate-income tract is a large rural area in Carbon County. The remaining low- and moderate-income census tracts are in or adjacent to Billings city limits, where consumers have access to many financial institutions.

Lastly, the bank's 2018 HMDA lending in LMI census tracts was generally consistent with its 2019 and 2020 HMDA lending.

Consumer. The geographic distribution of consumer loans is good. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

Adjusted FFIEC census data for 2019 and 2020 indicates that 2.2% of households reside in the low-income tract and 22.0% of households reside in the moderate-income tracts of the AA. In 2019 and 2020, the bank's overall lending in the low-income tract was 1.5% and 0.6%, respectively, which is comparable to demographics. In 2019 and 2020, the bank's overall lending in the moderate-income tracts was 12.5% and 12.9%, respectively, which is below demographics.

Although the bank's lending in moderate-income tracts is below demographics, it is still reasonable. The bank made consumer loans to borrowers in all low- and moderate-income census tracts in the AA during 2019 and 2020. One moderate-income tract is a rural area in Carbon County; the remaining low- and moderate-income census tracts are in or adjacent to Billings city limits where many financial institutions operate. Competition from other financial institutions is strong.

Lastly, the bank's 2018 consumer lending in LMI census tracts was generally consistent with its 2019 and 2020 consumer lending.

Small Business. The geographic distribution of small business loans is excellent. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Billings MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	13	3.1	1.8	1,273	3.2	2.1	18	1.8	1.8	1,299	1.8	2.0	2.3
Moderate	135	32.5	24.9	14,691	36.4	35.8	329	33.2	27.4	28,859	39.1	35.8	28.3
Middle	227	54.6	55.1	20,616	51.1	50.2	545	55.1	55.8	37,438	50.7	50.5	55.6
Upper	41	9.9	15.1	3,727	9.2	10.6	98	9.9	14.0	6,186	8.4	11.1	13.8

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Billings MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.0	0	0.0	1.4	0	0.0	1.0	0	0.0	0.6	
Total	416	100.0	100.0	40,307	100.0	100.0	990	100.0	100.0	73,782	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's small business lending was comparable to aggregate lenders' lending and demographics in the low-income tract in 2019 and 2020. According to D&B data, only 2.2% of businesses in 2019 and 2.3% of businesses in 2020 were in the low-income tract. In one portion of the low-income tract, there are some residences and businesses. The other portion of the tract is mostly comprised of larger parcels of land devoted to rail lines, livestock auction yards, a post office, a refinery, and a retired power station. Given the demographics and composition of the tract, the bank's lending is reasonable in this low-income tract.

For both years, the bank's small business lending (32.5% in 2019 and 33.2% in 2020) exceeded aggregate lenders' lending and demographics in the moderate-income tracts. According to D&B data, 28.4 % of businesses in 2019 and 28.3% of businesses in 2020 were in the moderate-income tracts. The bank's performance in these tracts is excellent given the comparison to demographics and the presence of strong competition located in or near several of the moderate-income tracts. Over 2019 and 2020, the bank made small business loans in all low- and moderate-income census tracts, as well as the other census tracts in the AA.

Lastly, the bank's 2018 small business lending in LMI census tracts was generally consistent with its 2019 and 2020 small business lending.

Community Development Loans

Community Development Loans in the Billings MSA AA		
Purpose	**#**	***$***
Affordable Housing	3	9,315,095
Community Services	1	1,200,000
Total	**4**	10,515,095

The bank made a relatively high level of community development loans in the Billings AA. As shown in the table, the bank originated or participated in four community development loans totaling $10.5 million during the evaluation period. Most of the community development loans supported affordable housing, a critical need in the AA as noted by bank management and community contacts. One loan for approximately $8.6 million facilitated the construction of an apartment complex with over 100 units. The two other loans supported LIHTC projects. The community service loan supported operations for an entity that provides various services to LMI individuals. The bank's community development loans are responsive to the needs in the AA.

INVESTMENT TEST

The bank made an excellent level of qualified investments in the Billings MSA AA, which exhibited excellent responsiveness to AA needs. During the evaluation period, the bank funded $7.6 million in a LIHTC project, resulting in the construction of 56 new affordable housing units in the AA. As previously mentioned, affordable housing in this AA continues to be in short supply, which makes this investment

very responsive. The bank's $12.7 million in prior-period investments primarily supports affordable housing but also includes $2.0 million that support community services to LMI individuals.

The bank made an excellent level of qualified investments in the form of donations as shown in the table at right. The majority of the bank's donations focused on community services targeted to LMI individuals. These donations helped local organizations provide critical services and resources to those in need, such as youth programs, health-related services, emergency housing and assistance for self-sufficiency, and food. The bank also made donations to organizations that support affordable housing, promote economic development, and help revitalize or stabilize low-income areas. The bank made several significant donations, as well as other smaller ones, to support basic needs related to health care (including accessibility to telehealth), food accessibility, and crisis intervention in the AA during the pandemic. Some of these donations helped organizations provide services to clients in a more effective way during that time of critical need in 2020.

Qualified Investment Donations in the Billings MSA AA

Purpose	#	$
Affordable Housing	9	30,550
Community Service	345	471,997
Economic Development	6	23,675
Revitalize or Stabilize	17	83,007
Total	**377**	**609,229**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and services do not vary in a way that inconveniences particular individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems are readily accessible in the bank's AA. The bank's services and hours do not vary in a way that inconveniences certain individuals or areas. The bank operates 10 full-service offices in the AA, with several offices in Billings, as well as offices in Absarokee, Columbus, Laurel, and Red Lodge. Most branches have drive-up facilities and ATMs, and most offer extended hours. Four branches are in moderate-income tracts, and those branches are also very near to the other low- and moderate-income tracts. The bank also operates ATMs in the AA, both stand-alone and at bank offices. Several ATMs are in moderate-income tracts.

The following table shows the geographic distribution of branches and drive-up facilities in this AA.

Geographic Distribution of Branches
Assessment Area: Billings MSA

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
	Total	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
Low	DTO	0		0	0	0			1	2.5%	2.2%	2.2%
	LS	0		0	0							

Moderate	**Total**	**5**	**45.5%**	**0**	**0**	**4**	**5**	**5**	9	22.5%	22.0%	27.4%
	DTO	1		0	0	1						
	LS	0		0	0							
Middle	**Total**	**5**	**45.5%**	**0**	**0**	**5**	**4**	**2**	24	60.0%	59.4%	56.2%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	**Total**	**1**	**9.1%**	**0**	**0**	**1**	**1**	**1**	6	15.0%	16.4%	14.1%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**11**	**100.0%**	**0**	**0**	**10**	**10**	**8**	40	100.0%	100.0%	100.0%
	DTO	1		0	0	1						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

Community Development Services in the Billings MSA AA	
Purpose	**#**
Community Services	40
Affordable Housing	4
Revitalize or Stabilize	9
Total	**53**

The bank provides a relatively high level of community development services in this AA. The table to the right shows the service activity and purpose category during the evaluation period. Thirty-nine bank employees provided 53 community development services for 19 organizations. The bank's community development services mainly focused on nonprofit organizations that provide essential services to LMI individuals (including youth and seniors), such as food, school supplies, rent assistance, financial literary, and school readiness preparation. Some board positions served organizations that provided critical services during the pandemic. In addition to those services, bank employees worked with an affordable housing organization to provide financial education to individuals working toward homeownership. Another employee served on the board of the same affordable housing organization and worked to improve business growth during the pandemic. Lastly, other bank employees provided financial education benefiting individuals in moderate-income census tracts. During the evaluation period, bank employees served in various roles for the organizations, such as board members, various committee members, presenters, and grant writers.

NONMETROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BOZEMAN, MONTANA, ASSESSMENT AREA

Bank Information. The bank operates seven full-service branches in the Bozeman AA: four branches in Bozeman and branches in Belgrade, Livingston, and Gardiner. Each branch except Gardiner offers drive-up services, and each branch has at least one ATM. An additional stand-alone ATM is also located in the AA. The bank closed one office in Belgrade and relocated one in Livingston during the evaluation period. By number, the bank has 4.7% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked second among 15 FDIC-insured institutions operating in Gallatin and Park counties, with 17.1% deposit market share and $743.4 million in deposits. The deposits in this AA represent 5.6% of the bank's overall deposits. The bank competes with a variety of banks and creditors, including regional banks, large national banks, and online mortgage lenders.

Assessment Area Information. The Bozeman AA is in southwestern Montana and includes Gallatin County and nearly all of Park County. This AA delineation did not change since the previous evaluation. Bozeman, the county seat of Gallatin County, is the largest city in the AA. The AA includes one low-, two moderate-, 12 middle- and 12 upper-income census tracts. The AA is adjacent to the bank's Billings MSA and Ennis AAs in Montana as well as the Jackson AA in Wyoming.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D&B data.[11]

Combined Demographics Report								
2020 Bozeman, MT AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.7	383	1.4	187	48.8	3,672	13.8
Moderate	2	7.4	971	3.7	146	15.0	4,346	16.3
Middle	12	44.4	10,583	39.8	573	5.4	5,396	20.3
Upper	12	44.4	14,649	55.1	717	4.9	13,172	49.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**27**	**100.0**	**26,586**	**100.0**	**1,623**	**6.1**	**26,586**	**100.0**

[11] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects OMB revised MSA delineations as applicable.

Combined Demographics Report

2020 Bozeman, MT AA

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,241	44	0.2	3.5	962	77.5	235	18.9
Moderate	3,275	1,003	3.5	30.6	2,043	62.4	229	7.0
Middle	23,920	11,826	41.4	49.4	7,365	30.8	4,729	19.8
Upper	24,922	15,697	54.9	63.0	6,145	24.7	3,080	12.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**53,358**	**28,570**	**100.0**	**53.5**	**16,515**	**31.0**	**8,273**	**15.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	66	0.7	59	0.7	6	1.0	1	1.2
Moderate	824	8.4	732	8.1	86	13.8	6	7.2
Middle	3,709	37.9	3,482	38.4	188	30.1	39	47.0
Upper	5,185	53.0	4,803	52.9	345	55.2	37	44.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,784**	**100.0**	**9,076**	**100.0**	**625**	**100.0**	**83**	**100.0**
Percentage of Total Businesses:				**92.8**		**6.4**		**0.8**

	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	5	1.2	5	1.2	0	0.0	0	0.0
Middle	223	53.9	222	54.0	1	50.0	0	0.0
Upper	186	44.9	184	44.8	1	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**414**	**100.0**	**411**	**100.0**	**2**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.3**		**0.5**		**0.2**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of Montana for the year of loan origination. The table below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Bozeman, MT					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$66,700**	0 - $33,349	$33,350 - $53,359	$53,360 - $80,039	$80,040 - & above
2019	**$65,100**	0 - $32,549	$32,550 - $52,079	$52,080 - $78,119	$78,120 - & above
2020	**$67,600**	0 - $33,799	$33,800 - $54,079	$54,080 - $81,119	$81,120 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the nonmetropolitan areas of Montana, which was $59,958 for 2018 and $59,777 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 111,031. The majority (85.5%) of the AA population resides in Gallatin County. Most residents in the AA are 25 to 64 years of age. The remaining age groups are as follows: 20.4% for residents 17 years and younger, 11.9% for residents 65 years and older, and 14.9% for residents aged 18 to 24 years. Bank management indicated that the AA continued to experience population growth during the evaluation period and that growth increased notably after the start of the COVID-19 pandemic.

Housing Information. According to 2020 FFIEC adjusted census data, the AA has 53,358 housing units: 53.5% are owner-occupied, 31.0% are rental units, and 15.5% are vacant. The median age of the housing stock is 32 years, which is somewhat lower than the statewide median age of 39 years. The median housing value is $263,681 and the affordability ratio is 20.2, compared to 24.4 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. Based on 2020 FFIEC adjusted census data, the median housing price in Gallatin County is highest at $271,500 compared to the state average of $193,500. Recent data shows home prices in the Bozeman area have grown significantly higher than these figures in the last five years.

The table below shows the housing cost burden for renters and owners by geography and income level in the AA, counties comprising the AA, nonmetropolitan areas of Montana, and state of Montana. As reflected in the table, individuals in the low-income bracket and some in the moderate-income bracket for both renter and homeowner categories exceed HUD's 30% cost-burden threshold. The cost burden is more significant for low-income individuals. Overall, the cost burden for renters and homeowners in the AA is generally similar to the state. However, recent increases to housing and rental costs have likely impacted these numbers.

Bozeman, MT Housing Cost Burden						
	Cost Burden - Renters			Cost Burden – Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Bozeman, MT	78%	41%	45%	61%	37%	22%
Gallatin County, MT	79%	41%	46%	61%	39%	21%
Park County, MT	74%	36%	37%	63%	28%	26%
NonMSA Montana	66%	26%	36%	55%	31%	21%
Montana	71%	29%	39%	56%	33%	20%
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						

According to bank management, this AA continues to experience a shortage of housing, including affordable housing. Bank management noted a recent study concluded that housing availability is about seven years behind in the area. Bank management indicated that while construction of new housing occurred over the evaluation period, the new inventory has not kept pace with demand. A community contact noted the median housing price was around or just slightly lower than $450,000 during 2018 and 2019. Bank management indicated the median housing price in the Livingston and Belgrade area was somewhat lower, approximately $300,000. Homes in the AA, most notably in Bozeman, were competitively sought; some buyers were also seeking investment properties in the area. Toward the end of 2020, housing prices, even in the areas of Livingston and Belgrade, escalated as more out-of-state individuals, including those with the ability to work remotely, relocated to the area given the quality of living and availability of outdoor recreation. While housing inventory was quite limited prior to 2020, the inventory declined even more in 2020. In some cases, buyers paid cash for homes without seeing them in person due to limited inventory. Community contacts indicated a great need for workforce housing in the area. Some businesses in the area have worked with developers or other parties to make atypical arrangements for workforce housing.

General Economic and Business Information. According to bank management and a community contact, the Bozeman AA had a generally strong economy and growth during the evaluation period, with some challenges related to the onset of the pandemic and the ongoing need for affordable housing. The economy is relatively diverse, including sectors such as technology (including professional services and manufacturing), tourism, education, health care, retail, and hospitality (including accommodations and food services), and construction. Tourism, which is driven by the proximity to Yellowstone National Park and the availability of numerous outdoor recreation opportunities, brings many people to the area. With the onset of the pandemic, tourism slowed in early 2020 and retail and hospitality-related businesses experienced declines in customers. Tourism started to increase in the later part of 2020.

A community contact stated that small businesses in the area did generally well through 2020 despite the onset of the pandemic. Some businesses were able to adapt to serve customers through online platforms or curbside service. However, other businesses, especially hospitality businesses, struggled. Some businesses relied on PPP loan funds and local grants to help retain employees and sustain themselves during a change in business operations and decreasing revenue. Bank management and a community contact noted that there were no noteworthy business closures or layoffs during the evaluation period. Businesses in the area experienced challenges with getting skilled workers or enough employees given the limited housing availability. Prior to the onset of the pandemic, this issue existed to a lesser extent; however, in the latter part of 2020, housing availability declined even more. Competition for employees is strong. According to a community contact, wages went up during the evaluation period. The median wage for Gallatin County increased above $20 per hour.

The annual average unemployment rate for the AA was slightly lower than the rate for the state during the evaluation period. The increase in the annual average unemployment rates during 2020 was a result of pandemic-related job losses. The following table provides the annual average unemployment rates for the AA, counties in the AA, and the state of Montana.

Annual Average Unemployment Rates			
Area	**2018**	**2019**	**2020**
Bozeman, MT AA	2.72%	2.49%	5.29%
Gallatin County, MT	2.56%	2.36%	5.02%
Park County, MT	3.89%	3.52%	7.44%
NonMSA Montana	3.96%	3.75%	5.93%
Montana	3.77%	3.60%	5.89%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOZEMAN, MONTANA

The bank's Lending Test performance in the Bozeman AA is good. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes. Overall, the geographic distribution of loans is also good. The bank is a leader in making community development loans. The bank extensively uses flexible loan programs for LMI borrowers. Examiners assigned equal weight to HMDA, small business, and consumer loans. Examiners did not include the bank's small farm lending in the analysis because agricultural loans are not a major product for this AA, based on volume.

Overall, the Investment Test performance in the Bozeman AA is excellent. The bank made an excellent level of qualified investments in the form of non-donation investments, as well as donations, which shows excellent responsiveness to credit and community development needs.

Finally, under the Service Test, the bank's delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any individuals or areas. Further, the bank provides an adequate level of community development services in the AA.

LENDING TEST

The bank's Lending Test performance in the Bozeman AA is good.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. The bank's market share for HMDA was similar in 2019 and 2020. For HMDA loans, the bank ranked fourth among 221 lenders reporting HMDA loans in 2019 and among 226 lenders in 2020. The bank's market share of HMDA lending averaged 6.6% for those two years. The bank ranked seventh, with 6.4% market share, among 66 lenders reporting CRA data in 2019 and eighth, with 4.7% market share, among 75 lenders in 2020. During the evaluation period, lending activity in this AA represented 6.9% by number and 7.1% by dollar amount of the bank's total lending. Within the Montana AAs, the lending activity in the Bozeman MSA AA was 17.2% by number and 19.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. At the product level, examiners evaluated home purchase, refinance, and home improvement loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of2)
Assessment Area: Bozeman, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	1.6	1.0	362	0.7	0.3	3	2.1	1.0	285	0.5	0.4	13.8
Moderate	18	9.8	8.3	3,482	6.4	4.9	13	8.9	8.5	2,732	5.3	4.8	16.3
Middle	42	22.8	20.8	11,888	21.7	15.3	24	16.4	20.1	6,610	12.7	15.1	20.3
Upper	103	56.0	58.4	33,398	61.1	65.1	96	65.8	61.7	38,622	74.4	69.4	49.5
Unknown	18	9.8	11.5	5,549	10.1	14.3	10	6.8	8.7	3,631	7.0	10.3	0.0
Total	184	100.0	100.0	54,679	100.0	100.0	146	100.0	100.0	51,880	100.0	100.0	100.0
Refinance Loans													
Low	5	4.5	2.5	621	2.3	1.1	2	0.6	1.4	279	0.3	0.7	13.8
Moderate	10	9.0	9.2	1,604	5.9	5.4	40	11.6	8.6	7,454	8.3	5.6	16.3
Middle	23	20.7	17.9	4,701	17.2	13.5	86	25.0	19.5	17,874	19.8	15.8	20.3
Upper	61	55.0	55.7	17,655	64.7	63.1	193	56.1	56.3	57,625	63.9	62.7	49.5
Unknown	12	10.8	14.7	2,693	9.9	16.9	23	6.7	14.2	6,974	7.7	15.1	0.0
Total	111	100.0	100.0	27,274	100.0	100.0	344	100.0	100.0	90,206	100.0	100.0	100.0
Home Improvement Loans													
Low	1	1.8	3.1	24	0.5	3.7	5	6.9	4.3	115	1.3	1.4	13.8
Moderate	6	10.5	7.3	477	10.1	3.9	12	16.7	9.8	1,378	16.0	6.4	16.3
Middle	11	19.3	17.6	730	15.4	10.1	19	26.4	18.4	2,031	23.5	14.9	20.3
Upper	32	56.1	62.6	3,010	63.6	71.3	34	47.2	62.4	4,982	57.8	70.9	49.5
Unknown	7	12.3	9.5	495	10.5	11.0	2	2.8	5.1	120	1.4	6.5	0.0
Total	57	100.0	100.0	4,736	100.0	100.0	72	100.0	100.0	8,626	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of2)
Assessment Area: Bozeman, MT

Total Home Mortgage Loans													
Low	12	3.0	1.7	1,214	1.3	0.7	10	1.7	1.3	679	0.4	0.6	13.8
Moderate	37	9.1	8.6	5,798	6.3	5.0	68	11.3	8.4	11,839	7.6	5.1	16.3
Middle	86	21.2	19.4	18,042	19.6	14.3	136	22.5	19.4	27,050	17.4	15.1	20.3
Upper	233	57.5	58.0	58,490	63.4	65.0	354	58.6	58.6	105,307	67.6	65.4	49.5
Unknown	37	9.1	12.4	8,737	9.5	15.0	36	6.0	12.3	10,852	7.0	13.7	0.0
Total	405	100.0	100.0	92,281	100.0	100.0	604	100.0	100.0	155,727	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Bozeman, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	4.2	1.7	44	0.9	0.7	0	0.0	1.1	0	0.0	2.3	13.8
Moderate	3	6.3	8.2	235	4.8	4.1	3	7.5	6.3	275	5.6	3.2	16.3
Middle	9	18.8	18.0	684	13.9	12.4	7	17.5	13.8	535	11.0	5.5	20.3
Upper	34	70.8	68.7	3,970	80.5	80.9	29	72.5	76.2	3,933	80.8	82.5	49.5
Unknown	0	0.0	3.4	0	0.0	1.8	1	2.5	2.6	127	2.6	6.6	0.0
Total	48	100.0	100.0	4,933	100.0	100.0	40	100.0	100.0	4,870	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	20.0	2.9	163	24.7	0.6	0	0.0	1.1	0	0.0	0.1	13.8
Moderate	0	0.0	9.5	0	0.0	3.1	0	0.0	0.0	0	0.0	0.0	16.3
Middle	1	20.0	19.0	39	5.9	7.1	0	0.0	17.8	0	0.0	5.2	20.3
Upper	3	60.0	65.7	457	69.3	84.0	2	100.0	70.0	145	100.0	61.9	49.5
Unknown	0	0.0	2.9	0	0.0	5.2	0	0.0	11.1	0	0.0	32.8	0.0
Total	5	100.0	100.0	659	100.0	100.0	2	100.0	100.0	145	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	13.8
Moderate	0	0.0	9.1	0	0.0	6.9	0	0.0	1.4	0	0.0	1.0	16.3
Middle	0	0.0	9.1	0	0.0	17.4	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	13.6	0	0.0	20.4	0	0.0	0.0	0	0.0	0.0	49.5
Unknown	0	0.0	68.2	0	0.0	55.3	0	0.0	98.6	0	0.0	99.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Based on 2019 and 2020 FFIEC adjusted census data, 13.8% of the families in the AA are low income and 16.3% are moderate income. In 2019 and 2020, the bank's overall lending to low- and moderate-income borrowers was below demographics but comparable to aggregate lenders. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as significant housing affordability and availability issues. The bank was fourth among several leading HMDA reporters in both 2019 and 2020; however, the bank's lending represents only 6.8% and 6.3% of HMDA loans reported in the AA for those years, respectively. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, regional banks, and large national banks.

Using the assumption that a borrower can obtain a loan for approximately three times their annual income, homes prices in the AA are generally unaffordable for LMI borrowers. Based on the 2020 FFIEC estimated median family income of $67,600 for the Bozeman AA, an individual with the highest income in the low-income bracket ($33,799) could afford a $101,397 home. Using the same assumption for borrowers with the highest income in the moderate-income bracket ($54,079), an individual could afford a $162,237 home. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $263,681. In addition, according to community contacts and bank management, the Bozeman area continues to face a critical affordable housing shortage and housing prices are often significantly higher than the previously stated median housing value.

In this AA, the bank made extensive use of flexible lending programs to help meet the credit needs of LMI borrowers. which enhances its performance related to HMDA lending. The bank participated in several programs, including MBOH, Fannie Mae HomeReady, NeighborWorks, and MoFi HomeNow, which help LMI borrowers (including first-time homebuyers) achieve homeownership in an AA with critical affordable housing concerns. Some programs include closing cost and down payment assistance. The bank also made FHA and VA loans. During the evaluation period, the bank made a total of $26.1 million in loans through these programs, which is noteworthy given housing affordability issues. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Finally, the bank's 2018 HMDA lending was generally consistent with its performance for 2019 and 2020.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Bozeman, MT

	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	2	0.6%	18	0.2%	17	4.8%	161	2.1%
Moderate	12	3.4%	216	2.8%	53	14.9%	856	11.1%
Low/Moderate Total	14	3.9%	234	3.0%	70	19.7%	1,017	13.2%
Middle	174	49.0%	3,798	49.4%	76	21.4%	1,638	21.3%
Upper	167	47.0%	3,664	47.6%	205	57.7%	4,986	64.8%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Bozeman, MT								
Unknown	0	0.0%	0	0.0%	4	1.1%	55	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	355	100.0%	7,696	100.0%	355	100.0%	7,696	100.0%
	Other – Secured							
Low	3	1.8%	36	1.1%	14	8.6%	152	4.5%
Moderate	6	3.7%	73	2.2%	28	17.2%	383	11.4%
Low/Moderate Total	9	5.5%	109	3.2%	42	25.8%	535	15.9%
Middle	72	44.2%	1,247	37.0%	31	19.0%	617	18.3%
Upper	82	50.3%	2,018	59.8%	87	53.4%	2,144	63.5%
Unknown	0	0.0%	0	0.0%	3	1.8%	78	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	163	100.0%	3,374	100.0%	163	100.0%	3,374	100.0%
	Other – Unsecured							
Low	1	0.9%	14	1.0%	20	18.3%	163	12.1%
Moderate	4	3.7%	13	1.0%	28	25.7%	273	20.3%
Low/Moderate Total	5	4.6%	27	2.0%	48	44.0%	436	32.4%
Middle	62	56.9%	747	55.5%	22	20.2%	268	19.9%
Upper	42	38.5%	572	42.5%	34	31.2%	541	40.2%
Unknown	0	0.0%	0	0.0%	5	4.6%	101	7.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	1,346	100.0%	109	100.0%	1,346	100.0%
	Consumer Loan Totals							
Low	6	1.0%	68	0.5%	51	8.1%	476	3.8%
Moderate	22	3.5%	302	2.4%	109	17.4%	1,512	12.2%
Low/Moderate Total	28	4.5%	370	3.0%	160	25.5%	1,988	16.0%
Middle	308	49.1%	5,792	46.6%	129	20.6%	2,523	20.3%
Upper	291	46.4%	6,254	50.4%	326	52.0%	7,671	61.8%
Unknown	0	0.0%	0	0.0%	12	1.9%	234	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	627	100.0%	12,416	100.0%	627	100.0%	12,416	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Bozeman, MT								
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Motor Vehicle							
Low	2	0.8%	26	0.4%	14	5.5%	208	3.4%
Moderate	12	4.7%	271	4.4%	44	17.3%	689	11.2%
Low/Moderate Total	14	5.5%	297	4.8%	58	22.8%	897	14.5%
Middle	97	38.2%	2,445	39.6%	54	21.3%	1,235	20.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Bozeman, MT								
Upper	143	56.3%	3,427	55.6%	142	55.9%	4,037	65.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	254	100.0%	6,169	100.0%	254	100.0%	6,169	100.0%
	Other – Secured							
Low	0	0.0%	0	0.0%	6	3.7%	101	2.5%
Moderate	2	1.2%	31	0.8%	16	9.8%	266	6.6%
Low/Moderate Total	2	1.2%	31	0.8%	22	13.4%	367	9.0%
Middle	55	33.5%	1,520	37.5%	31	18.9%	635	15.7%
Upper	107	65.2%	2,506	61.8%	110	67.1%	3,014	74.3%
Unknown	0	0.0%	0	0.0%	1	0.6%	41	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	164	100.0%	4,057	100.0%	164	100.0%	4,057	100.0%
	Other – Unsecured							
Low	0	0.0%	0	0.0%	6	9.5%	31	3.7%
Moderate	3	4.8%	32	3.8%	23	36.5%	284	33.6%
Low/Moderate Total	3	4.8%	32	3.8%	29	46.0%	315	37.3%
Middle	29	46.0%	347	41.1%	16	25.4%	210	24.9%
Upper	31	49.2%	466	55.1%	15	23.8%	276	32.7%
Unknown	0	0.0%	0	0.0%	3	4.8%	44	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	63	100.0%	845	100.0%	63	100.0%	845	100.0%
	Consumer Loan Totals							
Low	2	0.4%	26	0.2%	26	5.4%	340	3.1%
Moderate	17	3.5%	334	3.0%	83	17.3%	1,239	11.2%
Low/Moderate Total	19	4.0%	360	3.3%	109	22.7%	1,579	14.3%
Middle	181	37.6%	4,312	38.9%	101	21.0%	2,080	18.8%
Upper	281	58.4%	6,399	57.8%	267	55.5%	7,327	66.2%
Unknown	0	0.0%	0	0.0%	4	0.8%	85	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	481	100.0%	11,071	100.0%	481	100.0%	11,071	100.0%

According to 2019 and 2020 FFIEC adjusted census data, 18.9% of the households in the AA are low income and 14.8% are moderate income. For both years, the bank's overall lending to low-income borrowers was below demographics and was comparable to demographics for lending to moderate-income borrowers. Unsecured lending to moderate-income borrowers was notable as it was consistently above demographics. The bank's borrower distribution of loans is reasonable given the strong banking competition in the AA. Consumers have a variety of banking options.

The bank originates some small-dollar consumer loans. The bank originated 4.9% of all consumer loans in the AA for $3,000 or less. Of these small-dollar consumer loans, approximately 72.2% were to LMI

borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the LMI borrowers in the AA.

The bank's 2018 consumer lending was generally consistent with its 2019 and 2020 consumer lending.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Bozeman, MT

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	156	43.3	48.1	10,524	31.5	38.3	187	19.0	54.4	13,530	18.9	35.2	92.8
Over $1 Million	158	43.9		20,123	60.3		144	14.7		20,726	28.9		6.4
Revenue Unknown	46	12.8		2,734	8.2		651	66.3		37,373	52.2		0.8
Total	360	100.0		33,381	100.0		982	100.0		71,629	100.0		100.0
By Loan Size													
$100,000 or Less	292	81.1	92.6	10,375	31.1	39.9	818	83.3	87.3	24,046	33.6	33.8	
$100,001 - $250,000	37	10.3	3.9	6,425	19.2	16.2	99	10.1	7.1	16,348	22.8	19.5	
$250,001 - $1 Million	31	8.6	3.5	16,581	49.7	43.8	65	6.6	5.6	31,235	43.6	46.7	
Total	360	100.0	100.0	33,381	100.0	100.0	982	100.0	100.0	71,629	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	136	87.2		3,482	33.1		155	82.9		4,563	33.7		
$100,001 - $250,000	8	5.1		1,473	14.0		20	10.7		3,410	25.2		
$250,001 - $1 Million	12	7.7		5,569	52.9		12	6.4		5,557	41.1		
Total	156	100.0		10,524	100.0		187	100.0		13,530	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses was slightly below aggregate lenders' activity in 2019 and was below aggregate lenders' activity in 2020. According to 2019 and 2020 D&B data, 92.7% and 92.8% of businesses had gross annual revenues of $1 million or less, respectively. For both years, the bank's and aggregate lenders' lending activity were below demographic data. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less but still made most of its loans in those smaller amounts. In 2019 and 2020, the bank made 87.2% and 82.9%, respectively, of its small business loans to small entities for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with numerous financial

institutions for small business loans, including regional banks and large national banks, including national credit card lenders.

The bank's lending to businesses with unknown revenues increased significantly from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program; these loans are designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank's originated over 600 PPP loans in amounts of $1.0 million or less, totaling over $38.0 million in this AA. Of those PPP loans, more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

In addition to PPP loans, the bank also originated loans totaling $1.7 million through another SBA loan program. During the evaluation period, the bank made loans totaling approximately $40.6 million through these programs. For more information on flexible lending programs, refer to the Institution section of this evaluation.

The bank's 2018 small business lending was generally consistent with the bank's 2019 small business lending.

Geographic Distribution

Overall, the bank's geographic distribution of loans reflects good dispersion among census tracts of difference income levels and does not reflect any unexplained gaps in lending. The AA has one low-income and two moderate-income census tracts. In addition, the AA includes 12 middle-income tracts and 12 upper-income tracts, which collectively represent 88.8% of tracts in the AA.

Residential Real Estate. The geographic distribution of HMDA loans is good. The tables below display the distribution of the bank's 2019 and 2020 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Bozeman, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Moderate	3	1.6	2.3	981	1.8	1.9	8	5.5	2.0	2,761	5.3	1.5	3.5
Middle	82	44.6	33.0	21,060	38.5	25.7	68	46.6	36.8	20,872	40.2	30.3	41.4
Upper	99	53.8	64.4	32,638	59.7	72.3	70	47.9	61.2	28,247	54.4	68.0	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	184	100.0	100.0	54,679	100.0	100.0	146	100.0	100.0	51,880	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2) Assessment Area: Bozeman, MT													
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Moderate	2	1.8	1.8	474	1.7	1.5	9	2.6	1.8	2,414	2.7	1.5	3.5
Middle	45	40.5	32.1	9,391	34.4	26.0	161	46.8	30.0	39,061	43.3	25.0	41.4
Upper	64	57.7	66.0	17,409	63.8	72.4	174	50.6	68.1	48,731	54.0	73.4	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	111	100.0	100.0	27,274	100.0	100.0	344	100.0	100.0	90,206	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Moderate	3	5.3	3.4	292	6.2	2.3	1	1.4	2.6	35	0.4	3.5	3.5
Middle	33	57.9	36.3	2,476	52.3	29.4	34	47.2	36.3	4,046	46.9	34.8	41.4
Upper	21	36.8	60.3	1,968	41.6	68.3	37	51.4	61.1	4,545	52.7	61.7	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	4,736	100.0	100.0	72	100.0	100.0	8,626	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	6.3	0	0.0	2.2	0	0.0	4.3	0	0.0	3.5	13.8
Moderate	0	0.0	18.8	0	0.0	23.6	0	0.0	8.7	0	0.0	31.6	13.0
Middle	2	66.7	56.3	1,430	14.3	40.5	2	28.6	17.4	452	3.8	2.0	39.9
Upper	1	33.3	18.8	8,541	85.7	33.7	5	71.4	69.6	11,527	96.2	63.0	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	9,971	100.0	100.0	7	100.0	100.0	11,979	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.2
Moderate	9	2.2	2.2	1,820	1.8	2.3	18	2.9	1.9	5,210	3.1	2.8	3.5
Middle	185	45.3	32.6	35,986	35.2	26.1	282	46.2	32.6	65,828	39.3	26.1	41.4
Upper	214	52.5	65.0	64,446	63.0	71.4	311	50.9	65.4	96,668	57.6	70.9	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	408	100.0	100.0	102,252	100.0	100.0	611	100.0	100.0	167,706	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2) Assessment Area: Bozeman, MT													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.2	0.2
Moderate	1	2.1	2.1	73	1.5	2.1	0	0.0	1.6	0	0.0	1.0	3.5
Middle	21	43.8	25.3	1,438	29.2	16.9	15	37.5	24.3	1,252	25.7	17.5	41.4
Upper	26	54.2	72.5	3,422	69.4	80.9	25	62.5	73.5	3,618	74.3	81.4	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	48	100.0	100.0	4,933	100.0	100.0	40	100.0	100.0	4,870	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	2.2	0	0.0	1.3	3.5
Middle	2	40.0	32.4	191	29.0	23.6	2	100.0	32.2	145	100.0	14.8	41.4
Upper	3	60.0	67.6	468	71.0	76.4	0	0.0	65.6	0	0.0	83.9	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	659	100.0	100.0	2	100.0	100.0	145	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	2.9	0	0.0	1.8	3.5
Middle	0	0.0	54.5	0	0.0	48.3	0	0.0	42.0	0	0.0	31.8	41.4
Upper	0	0.0	45.5	0	0.0	51.7	0	0.0	55.1	0	0.0	66.4	54.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank did not make HMDA loans in the low-income census tract but made HMDA loans in all other tracts. The bank's lack of loans in the low-income tract is reasonable given tract demographics, performance context, and aggregate lenders' performance. Demographics show that the tract only contains 0.2% of the AA's owner-occupied housing units and 1.4% of families. In addition, aggregate lenders made only 0.1% of loans in the tract. The low-income census tract is primarily comprised of the Montana State University campus, including academic buildings, university housing, and other university facilities. According to 2020 FFIEC adjusted census data, most (77.5%) housing units in the low-income tract are rentals and 18.9% of housing units are vacant.

In those same years, the bank extended HMDA loans in each of the moderate-income census tracts, as well as the other tracts in the AA. The bank had 2.0% and 2.9% of its HMDA loans in 2019 and 2020, respectively, in the moderate-income tracts. The bank's lending in the moderate-income tracts is

comparable to the tracts' demographics that show only 3.5% of the AA's owner-occupied units and 3.7% of AA families are in the tracts. According to 2020 FFIEC adjusted census data, 62.4% of housing units are rentals and 7.0% of housing units are vacant in the moderate-income tracts. The bank's performance is comparable to aggregate lenders' performance, who reported 2.2% and 1.9% of HMDA loans in 2019 and 2020, respectively, in the moderate-income tracts. In addition to some rental housing, the moderate-income tracts also include a mix of commercial and industrial properties, such as big box retail stores, hotels, and a county detention center. The bank's lending in the low- and moderate-income tracts is reasonable given the demographics and composition of the tracts.

Lastly, the bank's 2018 HMDA lending in LMI tracts was generally consistent with its 2019 and 2020 HMDA lending.

Consumer. The geographic distribution of consumer loans is good. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

Adjusted FFIEC census data indicates that 2.2% of households reside in the low-income tract and 6.8% of households reside in the moderate-income tracts of the AA. In 2019 and 2020, the bank's overall lending in the low-income tract was 1.0% and 0.4%, respectively, which is comparable to demographics. In both years, the bank's overall lending in the moderate-income tracts was 3.5%, which is slightly below demographics. The bank's lending in the LMI tracts is reasonable given the demographics and other performance context. As noted above, the low-income tract is primarily comprised of a university. Students may have limited needs for consumer loans. In addition, those students who seek credit have numerous financial institutions in the Bozeman area that can provide consumer loans; the AA has a competitive banking environment. Over 2019 and 2020, the bank made consumer loans to borrowers in all census tracts in the AA, including LMI tracts.

Lastly, the bank's 2018 consumer lending in the LMI tracts was generally consistent with the bank's 2019 and 2020 consumer lending.

Small Business. The geographic distribution of small business loans is good. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Bozeman, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	3	0.8	0.4	300	0.9	0.4	4	0.4	0.5	976	1.4	0.7	0.7
Moderate	25	6.9	6.5	4,206	12.6	7.7	69	7.0	7.0	6,208	8.7	9.3	8.4
Middle	108	30.0	34.4	7,534	22.6	27.6	403	41.0	32.1	22,140	30.9	28.1	37.9
Upper	224	62.2	56.2	21,341	63.9	63.3	506	51.5	59.7	42,305	59.1	61.5	53.0

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Bozeman, MT													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.5	0	0.0	1.0	0	0.0	0.8	0	0.0	0.4	
Total	360	100.0	100.0	33,381	100.0	100.0	982	100.0	100.0	71,629	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

According to D&B data, only 0.7% of businesses in 2019 and 2020 were in the low-income tract. According to the same data, 8.4% of businesses in 2019 and 2020 were in the moderate-income tracts. The bank's small business lending was comparable to aggregate lenders' activity and demographics in the low- and moderate-income tracts in 2019 and 2020. Given the demographics and composition of the tract, the bank's lending is reasonable in the LMI tracts. As previously mentioned, the low-income tract is primarily comprised of Montana State University, which explains the limited credit demand from businesses in this tract. In the moderate-income tracts, small businesses can seek credit from any of the numerous financial institutions located nearby. Competition is strong in the AA, including competition from national credit cards lenders. Over 2019 and 2020, the bank made small business loans in all low- and moderate-income census tracts, as well as the other tracts in the AA.

Lastly, the bank's 2018 small business lending in LMI was comparable to the bank's 2019 and 2020 small business lending.

Community Development Loans

The bank is a leader in making community development loans in the Bozeman AA. As shown in the table, the bank originated seven community development loans totaling $43.5 million during the evaluation period. The majority of the bank's community development lending supported the revitalization or stabilization of low- and moderate-income areas in the AA; most of these dollars funded development in areas designated as economically distressed and in need of economic growth and job creation. In addition, two of the economic development purpose loans were related to a NMTC project. The NMTC program is set up to encourage community development and economic growth in distressed communities while financing businesses in those communities. The affordable housing purpose loan helps support the critical need of housing for low- and moderate-income individuals in the AA. The bank's community development loans are very responsive to the needs in the AA.

Community Development Lending in the Bozeman AA		
Purpose	**#**	***$***
Affordable Housing	1	650,000
Economic Development	3	12,961,377
Revitalize or Stabilize	3	29,841,069
Total	**7**	**43,452,446**

INVESTMENT TEST

The bank made an excellent level of qualified investments in the Bozeman AA, which exhibits excellent responsiveness to AA needs. The bank's investments included $8.5 million in new investments, $5.3 million in prior-period investments held during the evaluation period, and $103,357 in donations.

During the evaluation period, the bank funded $3.7 million in a NMTC project resulting in LMI job creation in an economically challenged area. In addition, the bank invested $4.8 million in mortgage-backed securities related to LMI multifamily housing in a moderate-income tract. As previously mentioned, affordable housing in this AA continues to be a critical need, which makes this investment particularly responsive. The bank's $5.3 million in prior-period investments include four bonds and one NMTC. These investments support economic development and revitalization and/or stabilization of moderate-income or distressed middle-income census tracts. The bank sold three of the prior-period bonds, totaling $2.5 million, during the evaluation period.

The bank made a significant level of qualified investments in the form of donations as shown in the table at right. The bank's donations primarily benefited organizations supporting community services targeted to LMI individuals. These donations helped local organizations provide critical services and resources to those in need, such as youth and family programs, senior services, health-related services, emergency housing, and food. As shown in the table, the bank also made donations to organizations that support affordable housing and promote economic development. The bank also made impactful donations supporting basic needs, including health care and food accessibility, in the AA during the pandemic. The donations were responsive to the AA needs during the evaluation, including after the onset of the pandemic.

Qualified Investment Donations in the Bozeman AA

Purpose	#	$
Affordable Housing	3	1,010
Community Service	110	101,689
Economic Development	4	659
Total	**117**	**103,358**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and retail services do not vary in a way that inconveniences individuals or areas. The bank provides an adequate level of community development services.

Retail Services

Delivery systems in the AA are readily accessible to the bank's geographies and to individuals of different income levels. The bank's services do not vary in a way that inconveniences certain individuals or areas. The bank operates seven full-service branches in the Bozeman AA: four branches in Bozeman and a branch in Belgrade, Livingston, and Gardiner. Most branches have drive-up facilities and offer extended hours. In 2020, the bank closed one of the two Belgrade branches located in middle-income tract 1.03. In addition, in 2020, the bank relocated the Livingston branch to a new location within the same tract, while a new office was constructed at the prior address.

Of the branches in the AA, one is located in the low-income tract, and one is in a moderate-income tract. In addition, two middle/upper-income branches are located within a mile of moderate-income tracts. The bank also operates ATMs in the AA, including a stand-alone ATM and ATMs located at most bank offices. Two ATMs are in the moderate-income tracts.

The following table shows the geographic distribution of branches in this AA.[12]

[12] The branch relocation is not reflected in the "opened" or "closed" branch columns of the table.

Geographic Distribution of Branches
Assessment Area: Bozeman, MT

Tract Income Levels		BRANCHES							DEMOGRAPHICS			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**1**	**14.3%**	**0**	**0**	**0**	**1**	**0**				
	DTO	0		0	0	0			1	3.7%	2.2%	0.6%
	LS	0		0	0							
Moderate	**Total**	**1**	**14.3%**	**0**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			2	7.4%	6.8%	8.1%
	LS	0		0	0							
Middle	**Total**	**4**	**57.1%**	**0**	**1**	**3**	**3**	**0**				
	DTO	0		0	0	0			12	44.4%	42.6%	38.6%
	LS	0		0	0							
Upper	**Total**	**1**	**14.3%**	**0**	**0**	**1**	**1**	**1**				
	DTO	0		0	0	0			12	44.4%	48.4%	52.7%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**7**	**100.0%**	**0**	**1**	**5**	**6**	**1**				
	DTO	0		0	0	0			27	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank provided an adequate level of community development services in this AA. The table to the right shows the service activity and purpose category during the evaluation period. Six bank employees provided seven community development services for four organizations. The bank's community development services mainly focused on nonprofit organizations that provide essential services to LMI individuals (including youth), such as financial education, food, and critical emergency services. While most

Community Development Services in the Bozeman AA	
Purpose	**#**
Community Services	5
Affordable Housing	1
Economic Development	1
Total	**7**

employees helping serve LMI individuals acted as presenters, two employees served as board members for organizations. In addition to those services, a bank employee instructed homebuyer education, which has an affordable housing purpose. Lastly, another bank employee promoted business development in the AA by serving as a board member for an organization with an economic development purpose. The bank's services addressed community needs, such affordable housing, food insecurity, and small business development.

METROPOLITAN AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREAT FALLS, MONTANA, MSA ASSESSMENT AREA

The bank operates three branches in this AA that includes the entirety of Cascade County (which is the Great Falls MSA), in the western portion of the state. This AA is adjacent to the bank's Helena AA. Two of the bank's offices in this AA are in moderate-income tracts. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREAT FALLS ASSESSMENT AREA

Examiners determined the bank's lending[13] and service test performance in this AA is consistent with the full-scope metropolitan AA. The investment test performance is below the full-scope AA. The bank's investment test performance conclusion in this AA is based primarily on the lack of new non-donation investments and the level of donations.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MISSOULA, MONTANA, MSA ASSESSMENT AREA

The bank operates three branches in this AA that includes the entirety of Missoula County (which is the Missoula MSA), in the western portion of the state. This AA is adjacent to the bank's Kalispell and Hamilton AAs. The AA includes a portion of the Flathead Indian Reservation. One of the bank's offices in this AA is in a low-income tract, and one is in a moderate-income tract. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MISSOULA ASSESSMENT AREA

Examiners determined the bank's lending[14] test performance in this AA is consistent with the performance in the full-scope metropolitan AA. The bank's investment test performance in this AA is below the performance in the full-scope metropolitan AA. The bank's service test performance in this AA exceeds the performance in the full-scope metropolitan AA. The bank's investment test performance conclusion in this AA is based primarily on the lack of new non-donation investments and the level of donations. The bank's service test performance conclusion in this AA is primarily based on the level of community development services.

The bank's community development loans in this AA are noteworthy. The bank made $17.3 million in community development loans, which primarily addressed affordable housing needs.

[13] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

[14] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development lending and qualified investments for each AA. The Montana state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AAs, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review
Montana MSA AAs

Assessment Area	*Lending Test*	*Investment Test*	*Service Test*
Great Falls MSA	Consistent	Below	Consistent
Missoula MSA	Consistent	Below	Exceeds

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CUT BANK, MONTANA, ASSESSMENT AREA

The bank operates one branch in this AA that includes a majority of Glacier County, in the northern portion of the state and borders Canada to the north. This AA is adjacent to the bank's Kalispell AA. The AA includes a portion of the Blackfeet Indian Reservation. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CUT BANK ASSESSMENT AREA

Examiners determined the bank's lending[15] test performance in this AA is consistent with the performance in the full-scope nonmetropolitan AA. The bank's service and investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is based on very limited donations and no new non-donation investments. The bank's service test performance conclusion in this AA is primarily based on the accessibility of delivery systems.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ENNIS, MONTANA, ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Madison County, in the southwestern portion of the state. This AA is adjacent to the bank's Bozeman AA. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ENNIS ASSESSMENT AREA

Examiners determined the bank's lending[16] test performance in this AA is consistent with the performance in the full-scope nonmetropolitan AA. The bank's service and investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is primarily based on the lack of new non-donation investments. The bank's service test performance conclusion in this AA is primarily based on the accessibility of delivery systems.

[15] Examiners did not include the bank's HMDA and small farm loans in the analysis because they are not major business lines for this AA.

[16] Examiners did not include the bank's HMDA and small farm loans in the analysis because they are not major business lines for this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HAMILTON, MONTANA, ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Ravalli County, in the western portion of the state. The bank's office in this AA is in a moderate-income tract. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HAMILTON ASSESSMENT AREA

Examiners determined the bank's lending[17] test and service test performance in this AA is consistent with the performance of the full-scope metropolitan AA. The bank's investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is primarily based on the lack of new non-donation investments.

The bank's community development lending in this AA is noteworthy. The bank made three loans for a total of $8.8 million in community development loans that support primarily, by dollar volume, revitalization or stabilization in the AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HARDIN-MILES CITY, MONTANA, ASSESSMENT AREA

The bank operates three branches in this AA that includes the entirety of Big Horn, Custer, and Rosebud counties, in the southeastern portion of the state. This AA is adjacent to the bank's Billings MSA AA. The AA includes the Northern Cheyenne Indian Reservation and a portion of the Crow Indian Reservation. One of the bank's offices in this AA is in a moderate-income tract. Since the last evaluation, the bank relocated its Hardin office to a newly constructed facility near its prior location.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HARDIN-MILES CITY ASSESSMENT AREA

Examiners determined the bank's lending test and service test performance in this AA is consistent with the performance of the full-scope metropolitan AA. The bank's investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is primarily based on the lack of new non-donation investments.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HELENA, MONTANA, ASSESSMENT AREA

The bank operates five branches in this AA that includes the entirety of Lewis and Clark County, in the western portion of the state. This AA is adjacent to the bank's Great Falls MSA and Kalispell AAs. The bank did not open or close any branches in this AA during the evaluation period.

[17] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HELENA ASSESSMENT AREA

Examiners determined the bank's lending[18] test performance in this AA is consistent with the performance in the full-scope nonmetropolitan AA. The bank's service and investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is primarily based on the lack of new non-donation investments. The bank's service test performance conclusion in this AA is primarily based on the accessibility of delivery systems.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KALISPELL, MONTANA, ASSESSMENT AREA

The bank operates eight branches in this AA that includes the entirety of Flathead and Lake counties, in the northwest portion of the state. This AA is adjacent to the bank's Cut Bank, Helena, and Missoula MSA AAs. The AA includes a portion of the Flathead Indian Reservation. One of the bank's offices in this AA is in a moderate-income tract. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KALISPELL ASSESSMENT AREA

Examiners determined the bank's lending[19] test and service test performance in this AA is consistent with the performance of the full-scope metropolitan AA. The bank's investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is based on the level of donations and the lack of new non-donation investments.

[18] Examiners did not include the bank's small farm loans in the analysis because they are not major business lines for this AA.

[19] Examiners did not include the bank's small farm loans in the analysis because they are not major business lines for this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Montana state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AAs, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Montana Assessment Areas			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Cut Bank	Consistent	Below	Below
Ennis	Consistent	Below	Below
Hamilton	Consistent	Below	Consistent
Hardin-Miles City	Consistent	Below	Consistent
Helena	Consistent	Below	Below
Kalispell	Consistent	Below	Consistent

WYOMING

CRA RATING FOR Wyoming: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Wyoming AAs shows excellent responsiveness to local credit needs.
- Overall, lending to businesses of different sizes and to LMI borrowers is excellent.
- The geographic distribution of loans throughout the AAs is good.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of flexible loan programs in its Wyoming branches.
- The bank has an overall significant level of qualified investments, including donations, which exhibit good responsiveness to credit and community development needs.
- Bank retail services are readily accessible to businesses, farms, and residents throughout the AAs. The bank also provides an adequate level of community development services in its Wyoming AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Wyoming is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed full-scope reviews of the Casper MSA and Sheridan-Gillette AAs. Examiners generally gave greater weight to the Sheridan-Gillette AA primarily because of total lending volume during the evaluation period.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Cheyenne MSA, Jackson, Laramie, and Riverton AAs in Wyoming. Examiners evaluated whether the bank's performance in the limited scope AAs was consistent with its performance in the full-scope AAs. The limited-scope MSA AA is compared against the metropolitan full-scope AA. The nonmetropolitan limited-scope AAs are compared to the nonmetropolitan full-scope AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WYOMING

Assessment Area Information. The bank had six AAs in the state during the evaluation period. The bank did not change the delineation of and did not add any Wyoming AAs since the previous evaluation.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks second among 47 FDIC-insured institutions in Wyoming, with 14.9% market share of the state's deposits. The bank's deposit market share was only .1% behind the market share leader, a large national bank. As of that same date, the bank has $2.8 billion in deposits in Wyoming, which represent 20.9% of the bank's total deposits. The remaining institutions in the state have deposit market shares representing 5.8% or less of the state's deposits. Generally, the bank operates in competitive banking environments in its Wyoming

AAs; the AAs include various types of financial institutions, including community banks and varying sizes of regional and national banks. Credit unions also compete for deposits, as well as loans, in some of the bank's AAs; credit union deposits are not included in the FDIC Deposit Market Share Report. The bank also competes with other non-bank mortgage lenders for loans.

According to 2020 FFIEC adjusted census data, the Wyoming AAs are comprised of 78 census tracts: three low-, 12 moderate-, 49 middle-, and 13 upper-income tracts as well as one unknown-income tract.[20] In 2020, seven nonmetropolitan middle-income tracts were classified as distressed.

Fremont County, which is the bank's Riverton AA, includes a significant portion of the Wind River Indian Reservation.

Population. The total population represented in the bank's Wyoming AAs is 362,424, or 62.5% of the state's population (579,679), according to 2020 FFIEC adjusted census data. Bank management and a community contact noted that some AAs have experienced continued population growth and that growth intensified in 2020. This intensification is attributed to the pandemic; more people gained the ability to work remotely, desired to have additional outdoor recreation opportunities, and sought out the quality of life available in the state of Wyoming.

Based on that same data, 64.1% and 21.7% of the families in the AA live in middle- and upper-income census tracts, respectively. Overall, 11.1% of households and 7.3% of families in the AA are below the poverty level. In Albany County, over 25.0% of households are below the poverty level. The data for the Wyoming AAs shows that residents 25 to 64 years of age represent 53.0% of the AA population. The remaining age groups are as follows: 23.3% for residents 17 years and younger, 12.6% for residents 65 years and older, and 11.1% for residents aged 18 to 24 years.

General Economic and Housing Information. Economic conditions in the bank's Wyoming AAs varied somewhat by market during the evaluation period. Some of the AAs include urban areas, and some AAs include more rural areas and national forest land, and the economies can vary accordingly. However, the economies are generally driven by some key industries, including tourism and hospitality, retail, health care, education, energy, construction, and agriculture. The onset of the pandemic impacted the state of Wyoming with some notable challenges related to agriculture prices, some temporary business closures or shifts in business operations, and a temporary decline in tourism. Overall, the state fared reasonably well through the end of 2020 despite the challenges from the pandemic. Many businesses participated in government programs for monetary assistance to offset lost income due to limited operations and closures or low commodity prices. Despite the impact of the pandemic in 2020, construction and development occurred in some AAs during the evaluation period.

While housing markets vary somewhat in the state, in general, housing demand and prices increased during the evaluation period. Community contacts noted there is a general lack of affordable housing, including workforce housing, across the state of Wyoming. Housing prices were increasing prior to the pandemic and continued to do so during 2020. A community contact noted that Teton County continues to be a popular spot for relocation from out-of-state individuals, and Cheyenne, in Laramie County, also became a desirable relocation spot.

According to 2020 FFIEC adjusted census data, in the Wyoming AAs, 57.4% of the housing was owner-occupied, 29.2% was rental, and 13.4% was vacant. The median housing value was $202,009 for the

[20] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

Wyoming AAs; Teton County had a significantly higher value of $689,000. In the Wyoming AAs, the median age of housing stock was 43.

As stated previously, generally, the bank operates in competitive markets in Wyoming. Various types of financial institutions and creditors operate in the AAs, and as a result, the competition for loans, deposits, and community development activities is generally strong.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING

Examiners based the bank's Wyoming evaluation on full-scope reviews of the Casper MSA and Sheridan-Gillette AAs and limited-scope reviews of the remaining Wyoming AAs. A detailed discussion of the bank's performance in the full-scope AAs and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Wyoming is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests. The ratings below primarily reflect the bank's performance in the full-scope AAs.

The Lending Test rating is high satisfactory. The bank's lending activity reflects excellent responsiveness to credit needs throughout the Wyoming AAs. Overall, the distribution of HMDA and consumer loans by income level and small business loans by revenue size of borrowers is excellent. The geographic distribution of loans is good. The bank provides an adequate level of community development loans. The bank extensively uses flexible loan programs (notably PPP loans, in addition to mortgage loan programs) in its Wyoming AAs to help meet credit needs.

The Investment Test rating is high satisfactory. Overall, qualified investments, including donations, are significant and demonstrate good responsiveness to community development needs. The bank lacks new qualified non-donation investments in the full-scope AAs, which is reasonable given performance context. The bank has an overall significant level of donations.

The Service Test rating is low satisfactory. Generally, the bank's delivery systems are readily accessible throughout the bank's Wyoming AAs. The bank's business hours and services do not vary in a way that inconveniences certain individuals or areas. The bank provides an adequate level of community development services.

LENDING TEST

The Lending Test rating is high satisfactory for Wyoming.

Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its Wyoming AAs. The table below shows the bank's lending in its Wyoming AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the Wyoming Assessment Areas				
Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	6,766	36.6	1,467,141	70.5
Small Business-reportable	4,955	26.8	421,521	20.3
Small Farm-reportable	710	3.8	55,311	2.7
Consumer-optional reportable	6,079	32.8	135,894	6.5
Total Loans	18,510	100.0	2,079,867	100.0

The Wyoming AAs account for 24.0% by number and 26.3% by amount of the bank's lending activity during the evaluation period. Small business lending increased from 2019 to 2020 due to the bank's PPP lending. In addition, HMDA lending increased from 2019 to 2020, which is primarily due to increased refinance activity.

In its Wyoming AAs, the bank was typically among the leading lenders for CRA- and HMDA-reportable loans.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the AAs. In addition, the geographic distribution of loans is good. The bank extends loans in census tracts of all income levels, including all low- and moderate-income tracts.

During the evaluation period, the bank made loans through flexible loan programs totaling approximately $600.0 million in its Wyoming AAs (primarily including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Casper MSA and Sheridan-Gillette AAs. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

Community Development Loans

The bank makes an adequate level of community development loans in the Wyoming AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. As shown in the table at right, the bank originated or renewed 13 community development loans totaling $18.3 million.

Wyoming Community Development Loans		
Purpose	*#*	*$*
Affordable Housing	5	13,938,500
Community Services	2	450,500
Revitalize or Stabilize	6	3,944,882
Total	**13**	**18,333,882**

The bank's community development lending benefited the Casper MSA, Cheyenne MSA, Laramie, Riverton, and Sheridan-Gillette AAs. The bank made community development loans in each Wyoming

AA except for the Jackson AA. By number, the bank made the most loans in the Laramie AA. By dollar, the bank had the most lending in the Cheyenne MSA and Laramie AAs. Most community development loan dollars (76.0%) supported affordable housing, specifically multifamily housing. Two of the affordable housing loans ($12.4 million) were part of complex LIHTC projects for seniors. Overall, the bank's community development lending is responsive to AA needs.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Wyoming. This conclusion primarily reflects the bank's performance in the full-scope AAs. Overall, the bank has a significant level of qualified investments (including donations) that show good responsiveness to credit and community development needs.

The bank did not make any new non-donation investments in the full-scope AAs, which is reasonable given performance context. The bank made three impactful new investments, one each in the Cheyenne MSA, Laramie, and the Riverton AAs, totaling $20.1 million. Two of the new investments, totaling $17.2 million, are LIHTC projects and promote affordable housing for seniors. These investments involve the same LIHTC projects where the bank provided community development loans, so the bank had high involvement in these projects. Affordable housing is a critical need in the state of Wyoming. The remaining $2.9 million investment in a NMTC project promotes economic development. The bank also held seven prior-period investments totaling $5.3 million (which includes bonds that were sold or matured during the evaluation period) that benefit four of its Wyoming AAs.

Given this responsiveness, examiners can also consider any qualified investments benefiting geographies outside the bank's Wyoming AAs. The bank held two prior-period bonds totaling $1.3 million that benefit geographies outside of its Wyoming AAs. One of the bonds was sold during the evaluation period.

Donations. The bank made an overall significant level of donations during the evaluation period. Most donations ($744,323) directly benefited the bank's Wyoming AAs. The bank also made $34,390 in donations that benefited regional and statewide areas that include the bank's AAs. The following table shows the distribution of donations by AA, as well as at the regional and statewide level.

Wyoming Qualified Investment Donations		
Assessment Area	**Total**	
	#	***$***
Casper MSA	135	328,978
Cheyenne MSA	64	117,210
Jackson	16	33,140
Laramie	19	73,930
Riverton	65	113,746
Sheridan-Gillette	115	77,319
Regional Wyoming	4	12,000
State of Wyoming	16	22,390
Total	434	778,713

Most donations, by number and dollar, benefited the bank's Casper MSA AA, followed by the Cheyenne MSA and Riverton AA (by dollar). The bank made donations in all of its Wyoming AAs. Most donations were to organizations that provide services to LMI individuals, including those at the regional or statewide level that include the bank's AAs. The bank supported the provision of youth programs, wellness-related facilities, job training, emergency housing, and items related to basic needs (such as

food) through its donations. The bank made some larger dollar donations to support organizations providing support, including shelter and food, or financial relief to LMI individuals at the AA level during the pandemic. The bank also made donations supporting affordable housing and economic development in certain AAs. The bank's donations that addressed financial and basic needs during the pandemic, as well as affordable housing, are particularly noteworthy. Overall, the bank's donations show excellent responsiveness to identified community needs.

Given this responsiveness, examiners also considered the bank's community development donations that are outside of its Wyoming AAs. The bank made three donations totaling $4,530 that benefited areas outside of its Wyoming AAs. These donations supported community services to LMI individuals. The table above does not include these donations.

SERVICE TEST

The Service Test rating is low satisfactory for Wyoming. Delivery systems are readily accessible to all portions of the Wyoming AAs. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences certain people or areas. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Finally, the bank provides an adequate level of community development services in the Wyoming AAs.

Retail Banking Services

Overall, the bank's delivery systems are readily accessible to residents and businesses throughout the bank's Wyoming AAs. The bank operates 18 branches, which include ATMs, and most include a drive-up facility. Most branches offer weekend and/or extended hours. The bank relocated one branch and closed one branch during the evaluation period. The following table shows the bank's distribution of offices and drive-up facilities (if applicable) as of 2020.[21]

Geographic Distribution of Branches
State of Wyoming

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**2**	**11.1%**	**0**	**0**	**1**	**1**	**1**				
	DTO	1		0	0	1			3	3.8%	2.5%	4.6%
	LS	0		0	0							
Moderate	**Total**	**2**	**11.1%**	**0**	**0**	**2**	**2**	**0**				
	DTO	0		0	0	0			12	15.4%	13.2%	8.4%
	LS	0		0	0							

[21] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within one mile of their prior location are not shown in the table.

Middle	**Total**	**12**	**66.7%**	**0**	**0**	**9**	**7**	**5**	49	62.8%	64.7%	69.9%
	DTO	2		0	0	2						
	LS	0		0	0							
Upper	**Total**	**2**	**11.1%**	**0**	**1**	**2**	**2**	**1**	13	16.7%	19.6%	17.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	1	1.3%	0.0%	0.1%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**18**	**100.0%**	**0**	**1**	**14**	**12**	**7**	78	100.0%	100.0%	100.0%
	DTO	3		0	0	3						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, the bank has 11.1% of its branches in both the low- and moderate-income census tracts. The percentage of the bank's branches in low-income tracts exceeds demographics, as 3.8% of the tracts in the Wyoming AAs are low-income tracts. The percentage of the bank's branches in moderate-income tracts is below demographics, as 15.4% of the tracts in the Wyoming AAs are moderate-income tracts.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank provides an adequate level of community development services in the Wyoming AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs. The bank provided community development services in all of its Wyoming AAs. Most of the services were in the Casper MSA, Laramie, and Riverton AAs. The table below shows the distribution of community development services by type of activity and AA.

Wyoming Community Development Services					
Assessment Area	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize or Stabilize***	***Total***
Casper MSA	7	15	0	0	22
Cheyenne MSA	0	6	0	0	6
Jackson	4	4	0	0	8
Laramie	0	11	2	7	20

Wyoming Community Development Services					
Assessment Area	*Affordable Housing*	*Community Services*	*Economic Development*	*Revitalize or Stabilize*	*Total*
Riverton	0	32	2	0	34
Sheridan-Gillette	0	9	0	0	9
Regional Wyoming	2	2	0	0	4
State of Wyoming	0	1	0	0	1
Totals	**13**	**80**	**4**	**7**	**104**

Numerous employees devoted time to provide financial expertise to organizations that support various community development initiatives. Employees often served in leadership roles, such as board members or finance committee members, and often provided financial literacy education. Most of the employees' activities related to supporting community services for LMI individuals. Examples of the services provided by the organizations to LMI individuals include health care, food assistance, financial education, and job skills training and support. Based on 2020 FFIEC adjusted census data, in the Wyoming AAs, 23.7% and 16.3% of households are low- and moderate-income, respectively, and 11.1% are below the poverty level. The bank's services are responsive to the community development needs in the AAs.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CASPER, WY, MSA ASSESSMENT AREA

Bank Information. The bank operates three full-service branches plus a drive-up only facility, for a total of four offices, in the Casper MSA AA. Two branches and the drive-up facility are in Casper, and the remaining branch is in Mills. Each branch offers drive-up services, as well as ATMs.[22] By number, the bank has 2.8% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked second among eight FDIC-insured institutions operating in Natrona County, with 28.2% deposit market share and $697.9 million in deposits. The deposits in this AA represent 5.2% of the bank's overall deposits. The bank competes with various types of institutions in the AA, including mortgage companies, regional banks, and small and large national banks.

Assessment Area Information. The Casper MSA AA is in central Wyoming and includes Natrona County, which is the Casper MSA. This AA delineation did not change since the previous evaluation. Casper, the county seat of Natrona, is the largest city in the AA. The AA includes one low-, three moderate-, 11 middle- and three upper-income census tracts. The AA is adjacent to the bank's Laramie, Riverton, and Sheridan-Gillette AAs, all in Wyoming.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D& B data.[23]

Combined Demographics Report								
2020 Casper, WY MSA AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**20,267**	**100.0**	**1,530**	**7.5**	**20,267**	**100.0**

[22] The downtown Casper drive-up facility has a different address from the downtown Casper branch based on its location.
[23] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects OMB revised MSA delineations as applicable.

Combined Demographics Report

2020 Casper, WY MSA AA

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**35,316**	**21,409**	**100.0**	**60.6**	**10,722**	**30.4**	**3,185**	**9.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	834	19.2	718	18.3	107	26.4	9	28.1
Moderate	423	9.7	348	8.9	71	17.5	4	12.5
Middle	2,297	52.8	2,128	54.4	159	39.3	10	31.3
Upper	798	18.3	721	18.4	68	16.8	9	28.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,352**	**100.0**	**3,915**	**100.0**	**405**	**100.0**	**32**	**100.0**
Percentage of Total Businesses:				**90.0**		**9.3**		**0.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	4.7	3	3.6	1	100.0	0	0.0
Moderate	8	9.4	8	9.5	0	0.0	0	0.0
Middle	37	43.5	37	44.0	0	0.0	0	0.0
Upper	36	42.4	36	42.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**85**	**100.0**	**84**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.8**		**1.2**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Casper MSA, for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Casper, WY MSA					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$74,400**	0 - $37,199	$37,200 - $59,519	$59,520 - $89,279	$89,280 - & above
2019	**$75,800**	0 - $37,899	$37,900 - $60,639	$60,640 - $90,959	$90,960 - & above
2020	**$79,300**	0 - $39,649	$39,650 - $63,439	$63,440 - $95,159	$95,160 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Casper MSA, which was $71,406 for 2018, 2019, and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 80,011. Most of the AA population, 54.2%, is 25 to 64 years of age. The remaining age groups are as follows: 23.9% for residents 17 years and younger, 12.6% for residents 65 years and older, and 9.3% for residents aged 18 to 24 years. Bank management indicated that the AA experienced a notable influx of new residents during the evaluation period after the start of the pandemic.

Housing Information. According to 2020 FFIEC adjusted census data, the AA has 35,316 housing units: 60.6% are owner-occupied, 30.4% are rental units, and 9.0% are vacant. The median age of the housing stock is 47 years, which is somewhat higher than the statewide median age of 37. The median housing value is $185,641 and the affordability ratio is 30.7, compared to 30.2 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

The Casper AA housing market was generally stable in 2018 and 2019. Bank management considered the housing supply robust in various price ranges. In 2020, among the contraction in the energy industry, people typically stayed in their current homes. However, in the latter part of 2020, a significant influx of people moved to the area. This influx is likely attributed to the increased availability of remote work and people's desire for more space and recreation. The housing supply decreased as a result, and home values started to increase significantly. In 2018, the average sales price of a home was around $220,000, and 2019 prices were relatively similar but slightly higher. Bank management and community contacts indicated that in 2020, the price trended up and the market became competitive. Community contacts indicated that some families are cost-burdened, allocating more than 30.0% of their monthly income to housing. Bank management noted the area has a relatively large, stable rental market.

The table below shows the housing cost burden for renters and owners by geography and income level. As reflected in the table, individuals in the low-income bracket for both renter and homeowner categories exceed HUD's 30.0% cost-burden threshold. Moderate-income homeowners in the Casper MSA also slightly exceed the cost-burden threshold. The cost burden is more significant for low-income individuals. Overall, the cost burden for renters and homeowners in the AA is generally similar to the state.

Casper, WY MSA AA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Casper, WY MSA AA	74%	29%	36%	55%	31%	16%
Wyoming	68%	25%	35%	53%	28%	17%
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						

General Economic and Business Information. During the evaluation period, the area experienced challenges related to the energy sector and the pandemic. At the start of the evaluation period and then through a portion of 2020, the Casper area economy was going through recovery from a downturn in the energy sector that occurred in 2015 and 2016. Commodity prices related to energy and extraction improved during that recovery period. This sector was also impacted by the pandemic when refineries and related businesses shut down. People working in the energy sector were forced to find new jobs with many moving into the construction industry; large construction projects related to two high schools and a hospital were underway, which provided employment opportunities. Construction was considered a critical industry during the pandemic and projects continued.

While some businesses were affected by the downturn in the energy sector and also by the pandemic, the area did not experience major layoffs or closures. During 2018 and 2019, bank management noted some moderate growth during the recovery period. In 2020, hospitality-related traffic slowed and some businesses, such as local restaurants that temporarily halted indoor dining, were impacted by the onset of the pandemic. Subsequently, unemployment in the area spiked higher than typical in 2020. By mid-2020, the national parks opened back up and visitors to the area increased significantly. Hospitality-related businesses, as well as others, were impacted by the availability of PPP funds as well as the revenue increase from recreational travel in the area.

Major industries in the area include health care, retail, energy, education, government, and manufacturing. The AA is home to the state's only international airport. A community contact indicated that the efforts have been underway to diversify the area's economy with additional manufacturing businesses, as well as aerospace-related businesses.

The annual average unemployment rate for the AA was above that of the state during the evaluation period. Bank management noted that some businesses in the AA had workforce issues during the evaluation period, such as a shortage of construction contractors. Unemployment increased during 2020 because of job losses brought on by the pandemic. The following table provides the annual average unemployment rates for the AA and the state of Wyoming.

Annual Average Unemployment Rates			
Area	2018	2019	2020
Casper, WY MSA AA	4.63%	4.01%	7.81%
Wyoming	4.05%	3.72%	5.84%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CASPER MSA ASSESSMENT AREA

The bank's Lending Test performance in the Casper MSA AA is good. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is also good. The bank makes an adequate level of community development loans. The bank extensively uses flexible loan programs to help meet credit needs in the AA. Examiners assigned the most weight to HMDA loans based on the total number and dollar volume of loans during the evaluation period, followed by consumer loans and small business loans.

The Investment Test performance in this AA is good. The bank did not make any non-donation investments in the AA, which is adequate given performance context. The bank's level of donations and the responsiveness to community development needs were excellent.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. Bank officers and employees provide a relatively high level of community development services.

LENDING TEST

The bank's Lending Test performance in the Casper MSA AA is good.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. The bank's market share for HMDA loans was similar in 2019 and 2020. For CRA loans, the bank's market share varied from 2019 to 2020. For HMDA loans, the bank ranked second among 135 lenders reporting HMDA loans in 2019 and first among 150 lenders in 2020. The bank's market share of HMDA lending averaged 13.8% for both years. The bank ranked first among 53 lenders reporting CRA data in 2019 and fifth among 59 lenders reporting CRA data in 2020. The bank's market share of small business loans was 13.4% in 2019 and higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented 5.3% by number and 6.0% by dollar amount of the bank's total lending. Within the Wyoming AAs, the lending activity in the Casper MSA AA was 22.3% by number and 22.8% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. At the product level, examiners evaluated home purchase and refinance loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Casper, WY MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	31	9.3	7.5	3,342	5.2	4.0	29	8.1	8.6	2,697	3.5	4.4	21.1
Moderate	79	23.6	23.2	11,106	17.2	16.3	94	26.3	25.6	15,579	20.0	18.6	16.4
Middle	65	19.4	24.3	11,407	17.7	21.1	78	21.8	20.6	16,369	21.0	19.9	21.7
Upper	128	38.2	27.2	34,548	53.6	37.0	139	38.9	23.6	39,873	51.3	33.3	40.7
Unknown	32	9.6	17.7	4,057	6.3	21.6	17	4.8	21.6	3,275	4.2	23.8	0.0
Total	335	100.0	100.0	64,460	100.0	100.0	357	100.0	100.0	77,793	100.0	100.0	100.0
Refinance Loans													
Low	7	7.4	7.4	815	4.4	3.9	16	5.1	4.6	2,086	2.8	2.5	21.1
Moderate	7	7.4	13.2	1,065	5.7	10.1	47	15.0	13.4	8,169	11.0	10.0	16.4
Middle	25	26.3	21.8	5,280	28.3	19.4	71	22.6	20.0	14,908	20.2	18.0	21.7
Upper	47	49.5	31.7	10,070	53.9	38.6	162	51.6	31.1	44,760	60.5	37.1	40.7
Unknown	9	9.5	25.8	1,442	7.7	28.0	18	5.7	30.9	4,029	5.4	32.3	0.0
Total	95	100.0	100.0	18,672	100.0	100.0	314	100.0	100.0	73,952	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	4.2	0	0.0	8.2	0	0.0	5.4	21.1
Moderate	2	10.5	10.7	70	5.7	7.5	3	15.8	12.2	330	21.8	11.1	16.4
Middle	3	15.8	25.0	305	24.7	29.6	3	15.8	22.4	117	7.7	16.3	21.7
Upper	11	57.9	53.6	721	58.4	51.5	11	57.9	49.0	1,011	66.8	46.6	40.7
Unknown	3	15.8	7.1	138	11.2	7.2	2	10.5	8.2	55	3.6	20.5	0.0
Total	19	100.0	100.0	1,234	100.0	100.0	19	100.0	100.0	1,513	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	38	8.3	7.2	4,157	4.9	3.9	46	6.6	6.6	4,838	3.1	3.5	21.1
Moderate	89	19.3	20.4	12,391	14.5	14.5	144	20.6	19.5	24,078	15.6	14.2	16.4
Middle	97	21.1	23.7	17,141	20.1	20.5	152	21.7	19.6	31,394	20.4	18.6	21.7
Upper	192	41.7	28.6	45,836	53.8	37.3	320	45.7	26.4	86,062	55.9	34.3	40.7
Unknown	44	9.6	20.1	5,637	6.6	23.8	38	5.4	28.0	7,599	4.9	29.4	0.0
Total	460	100.0	100.0	85,162	100.0	100.0	700	100.0	100.0	153,971	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Casper, WY MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.7	0	0.0	0.9	1	10.0	4.8	55	7.7	4.1	21.1
Moderate	1	12.5	18.5	150	25.0	13.8	0	0.0	23.8	0	0.0	16.3	16.4
Middle	2	25.0	33.3	53	8.8	11.8	0	0.0	4.8	0	0.0	3.9	21.7
Upper	5	62.5	44.4	397	66.2	73.5	8	80.0	61.9	418	58.6	57.6	40.7
Unknown	0	0.0	0.0	0	0.0	0.0	1	10.0	4.8	240	33.7	18.1	0.0
Total	8	100.0	100.0	600	100.0	100.0	10	100.0	100.0	713	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	8.0	0	0.0	17.4	21.1
Moderate	0	0.0	11.4	0	0.0	7.4	0	0.0	48.0	0	0.0	43.1	16.4
Middle	2	66.7	34.3	96	49.0	27.1	0	0.0	20.0	0	0.0	15.7	21.7
Upper	1	33.3	48.6	100	51.0	55.9	0	0.0	20.0	0	0.0	22.1	40.7
Unknown	0	0.0	5.7	0	0.0	9.7	0	0.0	4.0	0	0.0	1.6	0.0
Total	3	100.0	100.0	196	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics and comparable to aggregate lenders. For those same years, the bank's overall lending to moderate-income borrowers was comparable to aggregate lenders. In 2019, the bank's lending to moderate-income borrowers was comparable to demographics, and in 2020, the lending was slightly above demographics. At the product level, the bank's 2019 refinance lending to moderate-income borrowers was below demographics and aggregate lenders. Based on 2019 and 2020 FFIEC adjusted census data, 21.1% of the families in the AA are low income and 16.4% are moderate income. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans, in addition to affordability issues as discussed below. The bank was ranked second in 2019 and first in 2020 among several leading HMDA reporters; the bank's lending represents only 13.6% and 14.0% of HMDA loans reported in those years, respectively. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, regional banks, and small and large national banks.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $79,300 for the Casper MSA, an individual with the highest income in the low-income bracket ($39,649) could afford a $118,947

home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($63,439) could afford a $190,317 home. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $185,641. This data suggests that homeownership would not be affordable for some LMI borrowers. Further, bank management noted that the average sales price of a home sold in 2018 was $220,000. According to bank management and community contacts, home prices started to notably increase in 2020 after the start of the pandemic when people from outside the state of Wyoming moved to the AA. As a result, available housing inventory also started to decline.

In this AA, the bank made extensive use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in WCDA and Fannie Mae HomeReady programs, which help LMI borrowers (including first-time homebuyers) achieve homeownership. Some programs include closing cost and down payment assistance. The bank also made FHA and VA loans. During the evaluation period, the bank made a total of $68.5 million in loans through these programs, which is noteworthy given housing affordability issues. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 HMDA lending was generally consistent with the bank's 2019 and 2020 HMDA lending.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Casper, WY MSA

	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	6	3.0%	169	3.0%	24	11.9%	464	8.3%
Moderate	22	10.9%	558	9.9%	39	19.4%	988	17.6%
Low/Moderate Total	28	13.9%	727	12.9%	63	31.3%	1,452	25.9%
Middle	131	65.2%	3,660	65.2%	47	23.4%	1,329	23.7%
Upper	42	20.9%	1,230	21.9%	89	44.3%	2,763	49.2%
Unknown	0	0.0%	0	0.0%	2	1.0%	73	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	201	100.0%	5,617	100.0%	201	100.0%	5,617	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	8	7.2%	89	3.6%
Moderate	16	14.4%	282	11.5%	14	12.6%	173	7.0%
Low/Moderate Total	16	14.4%	282	11.5%	22	19.8%	262	10.7%
Middle	77	69.4%	1,742	70.9%	21	18.9%	395	16.1%
Upper	18	16.2%	432	17.6%	60	54.1%	1,607	65.4%
Unknown	0	0.0%	0	0.0%	8	7.2%	192	7.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	111	100.0%	2,456	100.0%	111	100.0%	2,456	100.0%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Casper, WY MSA								
	Other - Unsecured							
Low	7	9.5%	66	7.2%	22	29.7%	205	22.4%
Moderate	13	17.6%	74	8.1%	17	23.0%	131	14.3%
Low/Moderate Total	20	27.0%	140	15.3%	39	52.7%	336	36.8%
Middle	44	59.5%	650	71.1%	14	18.9%	169	18.5%
Upper	10	13.5%	124	13.6%	20	27.0%	388	42.5%
Unknown	0	0.0%	0	0.0%	1	1.4%	21	2.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	74	100.0%	914	100.0%	74	100.0%	914	100.0%
	Consumer Loan Totals							
Low	13	3.4%	235	2.6%	54	14.0%	758	8.4%
Moderate	51	13.2%	914	10.2%	70	18.1%	1,292	14.4%
Low/Moderate Total	64	16.6%	1,149	12.8%	124	32.1%	2,050	22.8%
Middle	252	65.3%	6,052	67.3%	82	21.2%	1,893	21.1%
Upper	70	18.1%	1,786	19.9%	169	43.8%	4,758	52.9%
Unknown	0	0.0%	0	0.0%	11	2.8%	286	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	386	100.0%	8,987	100.0%	386	100.0%	8,987	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Casper, WY MSA								
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Motor Vehicle							
Low	5	3.1%	101	2.1%	11	6.9%	189	4.0%
Moderate	16	10.1%	393	8.2%	34	21.4%	893	18.7%
Low/Moderate Total	21	13.2%	494	10.4%	45	28.3%	1,082	22.7%
Middle	111	69.8%	3,479	73.0%	40	25.2%	1,180	24.7%
Upper	27	17.0%	796	16.7%	72	45.3%	2,480	52.0%
Unknown	0	0.0%	0	0.0%	2	1.3%	27	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	159	100.0%	4,769	100.0%	159	100.0%	4,769	100.0%
	Other - Secured							
Low	3	2.9%	66	2.5%	13	12.5%	231	8.6%
Moderate	12	11.5%	383	14.3%	11	10.6%	227	8.5%
Low/Moderate Total	15	14.4%	449	16.8%	24	23.1%	458	17.1%
Middle	65	62.5%	1,487	55.7%	31	29.8%	680	25.4%
Upper	24	23.1%	736	27.5%	48	46.2%	1,520	56.9%
Unknown	0	0.0%	0	0.0%	1	1.0%	14	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	2,672	100.0%	104	100.0%	2,672	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Casper, WY MSA								
	Other - Unsecured							
Low	0	0.0%	0	0.0%	10	15.4%	99	10.4%
Moderate	14	21.5%	233	24.5%	20	30.8%	218	22.9%
Low/Moderate Total	14	21.5%	233	24.5%	30	46.2%	317	33.4%
Middle	38	58.5%	461	48.5%	14	21.5%	286	30.1%
Upper	13	20.0%	256	26.9%	16	24.6%	306	32.2%
Unknown	0	0.0%	0	0.0%	5	7.7%	41	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	65	100.0%	950	100.0%	65	100.0%	950	100.0%
	Consumer Loan Totals							
Low	8	2.4%	167	2.0%	34	10.4%	519	6.2%
Moderate	42	12.8%	1,009	12.0%	65	19.8%	1,338	15.9%
Low/Moderate Total	50	15.2%	1,176	14.0%	99	30.2%	1,857	22.1%
Middle	214	65.2%	5,427	64.7%	85	25.9%	2,146	25.6%
Upper	64	19.5%	1,788	21.3%	136	41.5%	4,306	51.3%
Unknown	0	0.0%	0	0.0%	8	2.4%	82	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	328	100.0%	8,391	100.0%	328	100.0%	8,391	100.0%

For both years, the bank's overall lending to low-income borrowers was below demographics and was generally comparable to demographics for lending to moderate-income borrowers. According to 2019 and 2020 FFIEC adjusted census data, 22.9% of the households in the AA are low income and 16.6% are moderate income. In 2019 and 2020, for other secured lending, the bank's lending to moderate-income borrowers was below demographics. In 2020, for motor vehicle lending, the bank's lending to moderate-income borrowers exceeded demographics. For other unsecured lending, for both years, the bank's lending to moderate-income borrowers exceeded demographics, and for 2019, the bank's lending to low-income borrowers also exceeded demographics. The bank's borrower distribution of loans is reasonable given the strong banking competition in the AA. Consumers have numerous banking options.

The bank continues to originate some small-dollar consumer loans. The bank originated 5.5% of all consumer loans in the AA for $3,000 or less. Of these small-dollar consumer loans, approximately 79.5% were to LMI borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the LMI borrowers in the AA.

In this AA, the bank made five WYTAP loans totaling $81,000. WYTAP is a flexible lending program that helps people finance assistive technology devices and services with a low interest rate. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Casper, WY MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	146	54.1	49.4	10,814	35.9	40.6	107	18.9	54.4	9,924	18.3	41.8	90.0
Over $1 Million	99	36.7		16,824	55.9		49	8.6		7,618	14.1		9.3
Revenue Unknown	25	9.3		2,458	8.2		411	72.5		36,622	67.6		0.7
Total	270	100.0		30,096	100.0		567	100.0		54,164	100.0		100.0
By Loan Size													
$100,000 or Less	192	71.1	90.8	6,489	21.6	35.6	430	75.8	83.9	14,148	26.1	27.2	
$100,001 - $250,000	44	16.3	4.9	7,965	26.5	18.3	78	13.8	8.6	12,382	22.9	19.8	
$250,001 - $1 Million	34	12.6	4.3	15,642	52.0	46.1	59	10.4	7.5	27,634	51.0	53.0	
Total	270	100.0	100.0	30,096	100.0	100.0	567	100.0	100.0	54,164	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	116	79.5		3,118	28.8		83	77.6		2,840	28.6		
$100,001 - $250,000	18	12.3		3,138	29.0		11	10.3		1,684	17.0		
$250,001 - $1 Million	12	8.2		4,558	42.1		13	12.1		5,400	54.4		
Total	146	100.0		10,814	100.0		107	100.0		9,924	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses exceeded aggregate lenders' activity in 2019 and was below aggregate lenders' activity in 2020. For both years, the bank's and aggregate lenders' lending activity were below demographic data. According to 2019 and 2020 D&B data, 89.2% and 90.0% of businesses had gross annual revenues of $1 million or less, respectively. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less but made most of its loans in those smaller amounts. In 2019 and 2020, the bank made 79.5% and 77.6%, respectively, of its small business loans to small entities for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with several financial institutions for small business loans, including large national banks, which include national credit card lenders, as well as a large regional bank and a nationally-chartered community bank.

The bank's lending to businesses with unknown revenues increased significantly from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program; these loans are designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank originated over 390 PPP loans in amounts of $1.0 million or less, totaling over $33.0 million in this AA. Of those PPP loans, more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to

small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

In addition to PPP loans, the bank also originated three loans totaling $513,000 through another SBA loan program. During the evaluation period, the bank made loans totaling over $33.9 million through these programs. For more information on flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 small business lending was comparable to the bank's 2019 small business lending.

Geographic Distribution

Overall, the bank's distribution of loans reflects good dispersion among census tracts of different income levels. The AA has one low-income and three moderate-income census tracts. In addition, the AA includes 11 middle-income tracts, which comprise 61.1% of the AA's tracts, as well as three upper-income tracts.

Residential Real Estate. The geographic distribution of residential real estate loans is good. The tables below display the distribution of the bank's 2019 and 2020 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Casper, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	9	2.7	2.4	1,026	1.6	1.3	13	3.6	3.0	1,373	1.8	1.5	4.0
Moderate	35	10.4	10.9	4,928	7.6	8.6	34	9.5	11.9	5,600	7.2	10.4	10.2
Middle	245	73.1	72.8	45,868	71.2	70.9	251	70.3	73.2	53,722	69.1	71.3	68.1
Upper	46	13.7	13.9	12,638	19.6	19.2	59	16.5	11.9	17,098	22.0	16.7	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	335	100.0	100.0	64,460	100.0	100.0	357	100.0	100.0	77,793	100.0	100.0	100.0
Refinance Loans													
Low	2	2.1	1.9	363	1.9	1.0	4	1.3	1.6	746	1.0	0.8	4.0
Moderate	7	7.4	7.3	1,024	5.5	5.0	27	8.6	7.7	4,956	6.7	6.7	10.2
Middle	64	67.4	69.2	12,050	64.5	65.6	199	63.4	70.2	43,725	59.1	66.9	68.1
Upper	22	23.2	21.5	5,235	28.0	28.3	84	26.8	20.5	24,525	33.2	25.6	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	95	100.0	100.0	18,672	100.0	100.0	314	100.0	100.0	73,952	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Casper, WY MSA

Home Improvement Loans													
Low	1	5.3	3.6	60	4.9	3.5	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	0	0.0	5.4	0	0.0	8.0	1	5.3	6.1	100	6.6	5.5	10.2
Middle	16	84.2	64.3	821	66.5	57.3	13	68.4	73.5	1,011	66.8	69.4	68.1
Upper	2	10.5	26.8	353	28.6	31.2	5	26.3	20.4	402	26.6	25.1	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	1,234	100.0	100.0	19	100.0	100.0	1,513	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	100.0	40.0	273	100.0	61.9	1	50.0	14.3	360	48.2	2.7	15.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	9.5	0	0.0	3.6	6.4
Middle	0	0.0	40.0	0	0.0	19.0	1	50.0	61.9	387	51.8	87.6	68.8
Upper	0	0.0	20.0	0	0.0	19.1	0	0.0	14.3	0	0.0	6.1	9.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	273	100.0	100.0	2	100.0	100.0	747	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	13	2.8	2.3	1,722	2.0	1.4	18	2.6	2.3	2,479	1.6	1.2	4.0
Moderate	43	9.3	10.0	5,972	7.0	7.7	62	8.8	9.9	10,656	6.9	8.5	10.2
Middle	335	72.7	71.8	59,515	69.7	69.3	470	67.0	72.1	99,065	64.0	69.9	68.1
Upper	70	15.2	15.9	18,226	21.3	21.5	152	21.7	15.6	42,518	27.5	20.4	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	461	100.0	100.0	85,435	100.0	100.0	702	100.0	100.0	154,718	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2)
Assessment Area: Casper, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.7	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	1	12.5	7.4	20	3.3	1.7	0	0.0	0.0	0	0.0	0.0	10.2
Middle	7	87.5	77.8	580	96.7	58.1	6	60.0	61.9	220	30.9	40.5	68.1
Upper	0	0.0	11.1	0	0.0	39.5	4	40.0	38.1	493	69.1	59.5	17.7

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2) Assessment Area: Casper, WY MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	600	100.0	100.0	10	100.0	100.0	713	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	0	0.0	14.3	0	0.0	8.6	0	0.0	4.0	0	0.0	2.0	10.2
Middle	3	100.0	57.1	196	100.0	46.6	0	0.0	80.0	0	0.0	72.5	68.1
Upper	0	0.0	28.6	0	0.0	44.8	0	0.0	16.0	0	0.0	25.5	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	196	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	1.2	4.0
Moderate	0	0.0	11.4	0	0.0	12.4	0	0.0	9.8	0	0.0	8.7	10.2
Middle	0	0.0	72.7	0	0.0	73.7	0	0.0	81.0	0	0.0	75.2	68.1
Upper	0	0.0	15.9	0	0.0	13.9	0	0.0	8.0	0	0.0	14.9	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank extended HMDA loans in each of the low- and moderate-income census tracts, as well as the other tracts in the AA. In 2019, the bank extended 2.8% and 9.3% of its HMDA loans in the low-income tract and the moderate-income tracts, respectively. The bank's 2019 lending in the low-income tract is comparable to the tract's demographics that show 4.0% of owner-occupied units and 5.4% of families are in the tract. According to 2020 FFIEC adjusted census data, 54.6% of housing units are rentals and 8.7% of housing units are vacant in the low-income tract. The bank's 2019 lending in the moderate-income tracts is also comparable to the tracts' demographics that show 10.2% of owner-occupied units and 10.2% of families are in these tracts. According to 2020 FFIEC adjusted census data, 37.8% of housing units are rentals and 7.3% of housing units are vacant in the moderate-income tracts. The bank's performance is comparable to aggregate lenders' performance, who reported 2.3% and 10.0% of loans in the low-income tract and the moderate-income tracts, respectively.

In 2020, the bank extended 2.6% and 8.8% of its HMDA loans in the low-income tract and the moderate-income tracts, respectively. The bank's 2020 lending in the low-income tract and the moderate-income tracts is comparable to the tract demographics noted above. The bank's performance is also comparable to aggregate lenders' performance, who reported 2.3% and 9.9% of loans in the low-income tract and the moderate-income tracts, respectively. The bank's overall performance is good given aggregate lenders' performance, demographics, and competition. The low- and moderate-income census tracts are in or adjacent to Casper city limits, where consumers have access to many financial institutions.

Lastly, the bank's 2018 HMDA lending was generally consistent with the bank's 2019 and 2020 HMDA lending.

Consumer. The geographic distribution of consumer loans is good. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

In 2019 and 2020, the bank's overall lending in the low-income tract was 3.4% and 2.4%, respectively, which is below demographics. By product level, the bank's lending in this tract is below demographics except for 2019 unsecured lending in the low-income tract, which is comparable to demographics. The bank did not make secured loans in the low-income tract in 2019 and did not make unsecured loans in the tract in 2020. In 2019 and 2020, the bank's overall lending in the moderate-income tracts was 13.2% and 12.8%, respectively, which is comparable to demographics. By product level, the bank's lending in the moderate-income tracts is also comparable to demographics except for 2019 and 2020 unsecured lending, which exceeded demographics. Adjusted FFIEC census data indicates that 6.7% of households reside in the low-income tract and 11.4% of households reside in the moderate-income tracts of the AA. The bank's lending in the LMI tracts is reasonable given the demographics and other performance context. Consumers who seek credit have numerous financial institutions in the Casper area that can provide consumer loans; the AA has a competitive banking environment. The bank made consumer loans to borrowers in all low- and moderate-income census tracts, as well as the other census tracts, in the AA during 2019 and 2020.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The geographic distribution of small business loans is excellent. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Casper, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	45	16.7	14.9	4,797	15.9	14.2	141	24.9	16.5	15,993	29.5	18.9	19.2
Moderate	45	16.7	11.1	6,473	21.5	17.1	75	13.2	12.1	8,674	16.0	15.1	9.7
Middle	123	45.6	48.6	14,938	49.6	48.2	249	43.9	46.6	22,547	41.6	44.8	52.8
Upper	57	21.1	21.6	3,888	12.9	17.2	102	18.0	23.4	6,950	12.8	20.0	18.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.8	0	0.0	3.3	0	0.0	1.3	0	0.0	1.2	
Total	270	100.0	100.0	30,096	100.0	100.0	567	100.0	100.0	54,164	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's small business lending was comparable to aggregate lenders' lending and demographics in the low-income tract in 2019. In 2020, the bank's small business lending exceeded aggregate lenders' activity and demographics in the tract. According to D&B data, only 18.7% of businesses in 2019 and 19.2% of businesses in 2020 were in the low-income tract.

In 2019, the bank's small business lending exceeded aggregate lenders' lending and demographics in the moderate-income tracts. In 2020, the bank's small business lending was comparable to aggregate lenders' activity and slightly exceeded demographics. According to D&B data, only 9.9 % of businesses in 2019 and 9.7% of businesses in 2020 were in the moderate-income tracts. The bank's performance in the low- and moderate-income tracts is excellent given the comparison to demographics and aggregate data, as well as the presence of strong competition located in or near several of the low- and moderate-income tracts. Over 2019 and 2020, the bank made small business loans in all low- and moderate-income census tracts, as well as the other CTs.

Lastly, the bank's 2018 small business lending was generally consistent with the bank's 2019 small business lending.

Community Development Loans

Community Development Loans in the Casper MSA AA		
Purpose	**#**	***$***
Revitalize or Stabilize	1	424,000
Total	**1**	**424,000**

The bank makes an adequate level of community development loans in the Casper AA. As shown in the table at right, the bank originated one community development loan for $424,000 during the evaluation period. The loan supported the revitalization or stabilization of low- and moderate-income areas in the AA by funding construction in and adjacent to LMI tracts targeted for redevelopment. The bank's community development loan is responsive to the needs in the AA and is adequate given that opportunities can be limited and other financial institutions also compete for these loans.

INVESTMENT TEST

Overall, the bank made a significant level of qualified investments, including donations, in the Casper MSA AA. The bank did not make any non-donation investments in this AA, which is adequate given performance context. Bank management noted that non-donation investment opportunities were limited. The bank did not hold any prior-period investments in this AA during the evaluation period.

Qualified Investment Donations in the Casper MSA AA		
Purpose	**#**	***$***
Affordable Housing	14	24,373
Community Service	120	302,105
Economic Development	1	2,500
Total	**135**	**328,978**

The bank made an excellent level of qualified investments in the form of donations as shown in the table at right. The majority of the bank's donations focused on community services targeted to LMI individuals. These donations helped local organizations provide critical services and resources to those in need, such as youth programs, health-related services, emergency housing, supplies for basic needs, and food. The bank also made donations to organizations that support affordable housing and promote economic development. The bank made some larger dollar donations to support basic needs related to health and personal care and food accessibility in the AA during the pandemic. The donations were very responsive to the AA needs during the pandemic and the evaluation period.

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and services do not vary in a way that inconveniences particular individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the AA are readily accessible to the bank's geographies and to individuals of different income levels. The bank's services do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates three full-service branches and one stand-alone drive-up facility in the Casper MSA AA. Two branches and the drive-up facility are in Casper, and the remaining branch is in Mills. The drive-up facility is adjacent to the Casper Downtown branch. The other branches have drive-up facilities as well and most offices, including the Casper Downtown drive-up facility, offer extended hours. In December 2020, the bank's Casper East branch relocated; the branch was moved less than one mile from the previous location and remained in the same census tract. One branch and the drive-up facility are in the low-income tract and one branch is in a moderate-income tract. The branch in the low-income tract is less than two miles from moderate-income tracts 8.00, 11.00, and 12.00. The bank also operates ATMs at each branch and the drive-up facility. Two ATMs are in the low-income tract, and one is in a moderate-income tract. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the geographic distribution of branches and drive-up facilities in this AA.[24]

Geographic Distribution of Branches
Assessment Area: Casper, WY MSA

Tract Income Levels	BRANCHES									DEMOGRAPHICS		
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**2**	**50.0%**	**0**	**0**	**1**	**1**	**1**				
	DTO	1		0	0	1			1	5.6%	6.7%	18.9%
	LS	0		0	0							
Moderate	**Total**	**1**	**25.0%**	**0**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			3	16.7%	11.4%	9.7%
	LS	0		0	0							
Middle	**Total**	**1**	**25.0%**	**0**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			11	61.1%	68.2%	52.6%
	LS	0		0	0							
Upper	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			3	16.7%	13.7%	18.8%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							

[24] The branch relocation is not reflected in the "opened" or "closed" branch columns of the table.

	Total	**4**	**100.0%**	**0**	**0**	**3**	**3**	**1**				
Totals	DTO	1		0	0	1			18	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank provides a relatively high level of community development services in the AA. The table to the right shows the service activity and purpose category during the evaluation period. Since the last evaluation, 17 bank employees provided 22 community development services to 11 organizations. The bank's community development services primarily focused on nonprofit organizations that provide essential services to LMI individuals (including youth), such as financial education, food assistance, and job skills training and support. Several employees serve LMI individuals by presenting financial information, and several employees also served in leadership capacities by serving as board members or committee members for organizations. In addition to those services, several bank employees served as board members or committee members for two organizations that promote affordable housing in the AA. The bank's services were responsive to community needs, such affordable housing and food insecurity.

Community Development Services in the Casper MSA AA	
Purpose	**#**
Community Services	15
Affordable Housing	7
Total	**22**

NONMETROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHERIDAN-GILLETTE, WYOMING, ASSESSMENT AREA

Bank Information. The bank operates five full-service branches and one drive-up facility in the Sheridan-Gillette AA, for a total of six offices. Two branches and the drive-up facility are in Sheridan, two branches are in Gillette, and one branch is in Buffalo. Each branch offers drive-up services, as well as ATMs.[25] By number, the bank has 4.2% of its branches and drive-up facilities in this AA. Refer to the Institution section of this evaluation for details on the bank's delivery services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked first among 12 FDIC-insured institutions operating in Campbell, Johnson, and Sheridan counties, with an 28.5% deposit market share and $846.2 million in deposits. The deposits in this AA represent 6.3% of the bank's overall deposits. The bank competes with regional, large national, and community banks, as well as an agricultural creditor.

Assessment Area Information. The Sheridan-Gillette AA is in northeastern Wyoming and borders the state of Montana. The AA includes Sheridan, Johnson, and Campbell counties; this delineation did not change since the previous evaluation. Sheridan, the county seat of Sheridan County, and Gillette, the county seat of Campbell County, are the largest cities in the AA. The AA includes 11 middle- and four upper-income census tracts. The AA is adjacent to the bank's Hardin-Miles City, MT AA and the Casper, WY MSA AA. The Crow Indian Reservation is also adjacent to the northern edge of the AA.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D& B data.[26]

Combined Demographics Report

2020 Sheridan-Gillette, WY 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	3,711	16.7
Moderate	0	0.0	0	0.0	0	0.0	3,565	16.0
Middle	11	73.3	14,389	64.7	724	5.0	4,996	22.4
Upper	4	26.7	7,866	35.3	414	5.3	9,983	44.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**15**	**100.0**	**22,255**	**100.0**	**1,138**	**5.1**	**22,255**	**100.0**

[25] The downtown Sheridan drive-up facility has a different address from the downtown Sheridan branch based on its location.
[26] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

Combined Demographics Report								
2020 Sheridan-Gillette, WY AA Demographics								
	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	26,709	16,050	67.3	60.1	7,093	26.6	3,566	13.4
Upper	11,605	7,813	32.7	67.3	2,781	24.0	1,011	8.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**38,314**	**23,863**	**100.0**	**62.3**	**9,874**	**25.8**	**4,577**	**11.9**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	5,396	82.9	4,958	83.1	326	76.7	112	92.6
Upper	1,115	17.1	1,007	16.9	99	23.3	9	7.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6,511**	**100.0**	**5,965**	**100.0**	**425**	**100.0**	**121**	**100.0**
Percentage of Total Businesses:				**91.6**		**6.5**		**1.9**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	230	87.1	228	87.0	2	100.0	0	0.0
Upper	34	12.9	34	13.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**264**	**100.0**	**262**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of Wyoming for the year of loan origination. The table

below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Sheridan-Gillette, WY					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$80,400**	0 - $40,199	$40,200 - $64,319	$64,320 - $96,479	$96,480 - & above
2019	**$79,700**	0 - $39,849	$39,850 - $63,759	$63,760 - $95,639	$95,640 - & above
2020	**$79,700**	0 - $39,849	$39,850 - $63,759	$63,760 - $95,639	$95,640 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the nonmetropolitan areas of Wyoming, which was $80,400 for 2018 and $79,700 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 86,351. The majority (90.0%) of the AA population is in Campbell and Sheridan counties. Most of the AA population, 54.5%, is 25 to 64 years of age. The remaining age groups are as follows: 25.4% for residents 17 years and younger, 11.7% for residents 65 years and older, and 8.5% for residents aged 18 to 24 years. Bank management indicated that the AA experienced a population increase during the evaluation period with people moving to the area for the quality of life. This influx of new residents was especially notable after the start of the pandemic.

Housing Information. According to 2020 FFIEC adjusted census data, the AA has 38,314 housing units: 62.3% are owner-occupied, 25.8% are rental units, and 12.0% are vacant. The median age of the housing stock is 36 years, which is comparable to the statewide median age of 37. The median housing value is $217,768, and the affordability ratio is 30.6, compared to 30.2 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Bank management and community contacts noted the need for affordable housing in the AA. Community contacts noted that some home building occurred, but building has generally not kept up with the housing needs. They also noted that businesses have had an interest in coming to Wyoming, including this area, but the limited amount or lack of workforce housing can be a deterrent. According to bank management, the real estate market varied from strong to stable in the communities in the AA. Home prices, including for lower-priced homes, increased during the evaluation period. Community contacts indicated that some families are cost-burdened, allocating more than 30.0% of monthly income to housing. According to bank management, the average sales prices of a home in this AA was just over $260,000 in 2019 and 2020.

The table below shows the housing cost burden for renters and owners in the AA, counties comprising the AA, nonmetropolitan areas of Wyoming, and the state of Wyoming, for individuals of different income levels. As reflected in the table, individuals in the low-income bracket for both renter and homeowner categories exceed HUD's 30.0% cost-burden threshold. Moderate-income individuals also exceed the cost-burden threshold in some geographies. The cost burden is more significant for low-income

individuals. Overall, the cost burden for renters and homeowners in the AA is generally similar to the state.

Sheridan-Gillette, WY Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Sheridan-Gillette, WY AA	69%	19%	33%	59%	36%	20%
Campbell County, WY	73%	12%	33%	65%	36%	18%
Johnson County, WY	64%	6%	26%	48%	26%	21%
Sheridan County, WY	64%	31%	35%	54%	40%	22%
NonMSA Wyoming	65%	19%	33%	50%	26%	17%
Wyoming	68%	25%	35%	53%	28%	17%
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						

General Economic and Business Information. Overall, the economy in the AA was fairly stable with some growth; however, some challenges arose in 2020 with the onset of the pandemic. The economy is driven by several industries, including government, education, health care, retail, energy (largely related to oil and coal extraction), agriculture (mainly cow/calf operations as well as hay crops), manufacturing, and tourism. During 2018 and 2019, energy prices were high, and businesses were in competition for employees. However, some large-scale job losses occurred when two coal mines were closed for a few months in 2019. In March 2020, a large energy-related employer in the area laid off 300 workers from local mines, and energy prices dropped as producers scaled back production in response to the start of the pandemic. The pandemic also caused a downturn in tourism and caused some local businesses, such as restaurants and hotels, to pivot to different business models and/or reliance on support from PPP loans and state funds.

The agricultural economy varied during the evaluation period as producers dealt with drought conditions early in 2018 and adequate prices in 2018 and 2019 that enabled producers to cover business and living expenses. In 2020, the demand for beef decreased, and prices paid to producers declined as well.

Despite some of these challenges, business development and plans for future development were underway during the evaluation period. For example, the local hospital renovated and expanded medical facilities, and the Wyoming Department of Transportation and the City of Sheridan worked on a major roadway and infrastructure project.

The annual average unemployment rate for the AA was generally consistent with that of the state. The following table provides the annual average unemployment rates for the AA, the counties in the AA, the nonmetropolitan areas of Wyoming, and the state of Wyoming. Bank management indicated that there was an increase in unemployment in 2020 due to job losses during the pandemic.

Average Annual Unemployment Rates			
Area	**2018**	**2019**	**2020**
Sheridan-Gillette, WY AA	4.06%	3.73%	6.04%
Campbell County, WY	4.09%	3.80%	6.90%
Johnson County, WY	3.99%	3.74%	5.53%
Sheridan County, WY	4.05%	3.64%	4.94%
NonMSA Wyoming	3.98%	3.70%	5.63%
Wyoming	4.05%	3.72%	5.84%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SHERIDAN-GILLETTE, WYOMING ASSESSMENT AREA

The bank's Lending Test performance in the Sheridan-Gillette AA is good. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes. The geographic distribution of loans is also adequate. The bank makes an adequate level of community development loans. The bank extensively uses flexible loan programs to help meet credit needs in the AA, including for LMI borrowers. Examiners assigned equal weight to HMDA, consumer, and small business loans based on the number and dollar volume of the loans during the evaluation period. Examiners did not include the bank's small farm lending in the analysis based on the low small farm lending volume in this AA in comparison to the volume of the other products.

Overall, the Investment Test performance in the Sheridan-Gillette AA is significant. The bank held a prior-period investment during the evaluation period but did not make any new non-donation investments in the AA, which is adequate given performance context. The bank's level of donations was significant, and the responsiveness to community development needs was good.

Finally, under the Service Test, the bank's delivery systems are accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provides an adequate level of community development services in the AA.

LENDING TEST

The bank's Lending Test performance in the Sheridan-Gillette AA is good.

Lending Activity

The bank's lending activity reflects excellent responsiveness to AA credit needs. In 2019, the bank ranked first among 141 lenders reporting HMDA loan data, with an 18.4% market share. In 2020, the bank ranked first among 158 lenders reporting HMDA loan data, with a 17.0% market share. For CRA reporters, the bank ranked third among 63 lenders reporting CRA data in 2019 and fifth among 90 lenders reporting CRA in 2020. The bank's market share of small business loans was 11.3% in 2019 and higher in 2020 due to the bank's PPP lending. During the evaluation period, lending activity in this AA represented 7.9% by number and 7.2% by dollar amount of the bank's total lending. Within the bank's Wyoming AAs, the lending activity in the Sheridan-Gillette AA was 33.1% by number and 27.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is excellent. At the product level, examiners evaluated home purchase, refinance, and home improvement loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Sheridan-Gillette, WY

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	20	7.4	4.5	2,340	3.6	2.4	27	10.7	5.7	3,761	6.4	3.3	16.7
Moderate	76	27.9	18.4	12,475	19.4	14.2	63	25.0	17.5	10,513	18.0	14.1	16.0
Middle	77	28.3	19.8	18,008	28.0	19.4	69	27.4	19.5	15,602	26.7	18.9	22.4
Upper	90	33.1	24.5	29,124	45.3	31.8	79	31.3	20.1	25,564	43.8	26.9	44.9
Unknown	9	3.3	32.8	2,391	3.7	32.2	14	5.6	37.2	2,948	5.0	36.8	0.0
Total	272	100.0	100.0	64,338	100.0	100.0	252	100.0	100.0	58,388	100.0	100.0	100.0
Refinance Loans													
Low	12	8.6	7.1	1,320	4.6	4.1	27	5.7	3.4	3,496	3.4	1.9	16.7
Moderate	21	15.0	13.8	3,558	12.3	10.4	78	16.6	10.1	12,524	12.1	7.4	16.0
Middle	35	25.0	19.2	6,437	22.3	17.8	123	26.1	18.4	25,135	24.3	16.6	22.4
Upper	56	40.0	30.5	14,625	50.7	36.9	209	44.4	28.9	54,992	53.2	33.5	44.9
Unknown	16	11.4	29.5	2,895	10.0	30.9	34	7.2	39.2	7,171	6.9	40.7	0.0
Total	140	100.0	100.0	28,835	100.0	100.0	471	100.0	100.0	103,318	100.0	100.0	100.0
Home Improvement Loans													
Low	3	7.9	6.0	123	4.5	4.1	5	11.6	9.7	516	11.0	8.1	16.7
Moderate	9	23.7	14.9	690	25.3	13.5	9	20.9	22.6	799	17.1	15.3	16.0
Middle	6	15.8	16.4	476	17.5	11.2	5	11.6	11.3	526	11.3	13.2	22.4
Upper	18	47.4	52.2	1,324	48.6	54.2	21	48.8	41.9	2,092	44.8	31.9	44.9
Unknown	2	5.3	10.4	110	4.0	16.9	3	7.0	14.5	739	15.8	31.6	0.0
Total	38	100.0	100.0	2,723	100.0	100.0	43	100.0	100.0	4,672	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	42	8.7	5.5	4,071	4.1	3.0	59	7.5	4.2	7,773	4.6	2.4	16.7
Moderate	114	23.6	16.5	17,197	17.4	12.7	154	19.5	12.8	24,063	14.2	9.8	16.0
Middle	122	25.2	19.0	25,009	25.3	18.3	203	25.7	18.1	41,624	24.6	17.1	22.4

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2) Assessment Area: Sheridan-Gillette, WY													
Upper	178	36.8	27.4	47,273	47.7	33.6	321	40.7	25.0	84,566	50.0	30.5	44.9
Unknown	28	5.8	31.6	5,452	5.5	32.3	52	6.6	39.9	10,958	6.5	40.2	0.0
Total	484	100.0	100.0	99,002	100.0	100.0	789	100.0	100.0	168,984	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2) Assessment Area: Sheridan-Gillette, WY													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	6	18.2	12.8	213	7.0	5.3	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	8	24.2	17.0	474	15.6	11.8	4	17.4	24.3	227	8.7	13.1	16.0
Middle	4	12.1	17.0	88	2.9	6.4	6	26.1	27.0	361	13.9	14.5	22.4
Upper	14	42.4	51.1	2,200	72.6	75.1	12	52.2	45.9	1,918	73.6	69.2	44.9
Unknown	1	3.0	2.1	56	1.8	1.4	1	4.3	2.7	100	3.8	3.2	0.0
Total	33	100.0	100.0	3,031	100.0	100.0	23	100.0	100.0	2,606	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	100.0	10.0	75	100.0	6.4	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	0	0.0	25.0	0	0.0	24.1	0	0.0	25.0	0	0.0	6.7	16.0
Middle	0	0.0	5.0	0	0.0	12.7	0	0.0	8.3	0	0.0	16.5	22.4
Upper	0	0.0	50.0	0	0.0	44.2	0	0.0	25.0	0	0.0	50.9	44.9
Unknown	0	0.0	10.0	0	0.0	12.6	0	0.0	41.7	0	0.0	25.9	0.0
Total	1	100.0	100.0	75	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.7
Moderate	0	0.0	1.9	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	16.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Upper	0	0.0	1.9	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	44.9
Unknown	0	0.0	96.2	0	0.0	96.5	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics and slightly exceeded aggregate lenders' activity. For those same years, the bank's overall lending to moderate-income borrowers exceeded aggregate lenders' activity and demographics. Based on 2019 and 2020 FFIEC adjusted census data, 16.7% of the families in the AA are low income and 16.0% are

moderate income. The bank's lending to LMI borrowers is excellent given the competitive market for HMDA loans, the bank's performance compared to aggregate lenders' performance, as well as affordability factors. The bank is first among several leading HMDA reporters in both 2019 and 2020; the bank's lending represents only 18.4 % and 17.0% of HMDA loans reported in those years, respectively. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, online lenders, a credit union, and regional and national banks.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $79,700 for the nonmetropolitan areas of Wyoming, an individual with the highest income in the low-income bracket ($39,849) could afford a $119,547 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($63,759) could afford a $191,277 home. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $217,768. This data suggests that homeownership would not be affordable for many LMI borrowers. As previously mentioned, the real estate market varies in the AA, but generally, there is a shortage of affordable housing. In addition, home prices increased during the evaluation period. For this AA, bank management stated that the average sales price of a home was just over $260,000 in 2019 and 2020.

In this AA, the bank made extensive use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in WCDA and Fannie Mae HomeReady programs, which help LMI borrowers (including first-time homebuyers) achieve homeownership. Some programs include closing cost and down payment assistance. The bank also made FHA and VA loans. During the evaluation period, the bank made a total of $219.5 million in loans through these programs, which is noteworthy given housing affordability issues. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 HMDA lending performance was generally consistent with the bank's 2019 and 2020 HMDA lending performance.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: Sheridan-Gillette, WY

	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	31	7.2%	554	4.9%
Moderate	0	0.0%	0	0.0%	80	18.7%	1,632	14.5%
Low/Moderate Total	0	0.0%	0	0.0%	111	25.9%	2,186	19.4%
Middle	224	52.3%	5,585	49.6%	102	23.8%	2,445	21.7%
Upper	204	47.7%	5,665	50.4%	211	49.3%	6,535	58.1%
Unknown	0	0.0%	0	0.0%	4	0.9%	84	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	428	100.0%	11,250	100.0%	428	100.0%	11,250	100.0%

	Other - Secured							
Low	0	0.0%	0	0.0%	19	9.0%	244	4.9%
Moderate	0	0.0%	0	0.0%	34	16.0%	497	10.0%
Low/Moderate Total	0	0.0%	0	0.0%	53	25.0%	741	15.0%
Middle	128	60.4%	2,360	47.7%	58	27.4%	1,361	27.5%
Upper	84	39.6%	2,586	52.3%	96	45.3%	2,788	56.4%
Unknown	0	0.0%	0	0.0%	5	2.4%	56	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	212	100.0%	4,946	100.0%	212	100.0%	4,946	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	28	20.6%	199	13.3%
Moderate	0	0.0%	0	0.0%	35	25.7%	361	24.1%
Low/Moderate Total	0	0.0%	0	0.0%	63	46.3%	560	37.3%
Middle	101	74.3%	1,135	75.6%	31	22.8%	311	20.7%
Upper	35	25.7%	366	24.4%	36	26.5%	534	35.6%
Unknown	0	0.0%	0	0.0%	6	4.4%	96	6.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	136	100.0%	1,501	100.0%	136	100.0%	1,501	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	78	10.1%	997	5.6%
Moderate	0	0.0%	0	0.0%	149	19.2%	2,490	14.1%
Low/Moderate Total	0	0.0%	0	0.0%	227	29.3%	3,487	19.7%
Middle	453	58.4%	9,080	51.3%	191	24.6%	4,117	23.3%
Upper	323	41.6%	8,617	48.7%	343	44.2%	9,857	55.7%
Unknown	0	0.0%	0	0.0%	15	1.9%	236	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	776	100.0%	17,697	100.0%	776	100.0%	17,697	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: Sheridan-Gillette, WY

	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Motor Vehicle							
Low	0	0.0%	0	0.0%	24	7.5%	498	5.6%
Moderate	0	0.0%	0	0.0%	64	20.1%	1,673	18.7%
Low/Moderate Total	0	0.0%	0	0.0%	88	27.6%	2,171	24.3%
Middle	207	64.9%	5,532	61.9%	89	27.9%	2,455	27.5%
Upper	112	35.1%	3,403	38.1%	141	44.2%	4,287	48.0%
Unknown	0	0.0%	0	0.0%	1	0.3%	22	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	319	100.0%	8,935	100.0%	319	100.0%	8,935	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	16	8.2%	164	3.6%
Moderate	0	0.0%	0	0.0%	30	15.4%	567	12.5%
Low/Moderate Total	0	0.0%	0	0.0%	46	23.6%	731	16.2%
Middle	121	62.1%	2,632	58.2%	45	23.1%	999	22.1%

Upper	74	37.9%	1,889	41.8%	102	52.3%	2,768	61.2%
Unknown	0	0.0%	0	0.0%	2	1.0%	23	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	195	100.0%	4,521	100.0%	195	100.0%	4,521	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	18	16.5%	134	8.1%
Moderate	0	0.0%	0	0.0%	24	22.0%	211	12.8%
Low/Moderate Total	0	0.0%	0	0.0%	42	38.5%	345	20.9%
Middle	75	68.8%	1,044	63.3%	26	23.9%	303	18.4%
Upper	34	31.2%	604	36.7%	38	34.9%	951	57.7%
Unknown	0	0.0%	0	0.0%	3	2.8%	49	3.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	1,648	100.0%	109	100.0%	1,648	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	58	9.3%	796	5.3%
Moderate	0	0.0%	0	0.0%	118	18.9%	2,451	16.2%
Low/Moderate Total	0	0.0%	0	0.0%	176	28.3%	3,247	21.5%
Middle	403	64.7%	9,208	61.0%	160	25.7%	3,757	24.9%
Upper	220	35.3%	5,896	39.0%	281	45.1%	8,006	53.0%
Unknown	0	0.0%	0	0.0%	6	1.0%	94	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	623	100.0%	15,104	100.0%	623	100.0%	15,104	100.0%

For both years, the bank's overall lending to low-income borrowers was below demographics and exceeded demographics for lending to moderate-income borrowers. In 2019 and 2020, for other secured lending, the bank's lending to moderate-income borrowers was comparable to demographics. For other unsecured lending, for both years, the bank's lending to low-income borrowers was comparable to demographics. According to 2019 and 2020 FFIEC adjusted census data, 19.3% of the households in the AA are low income and 15.2% are moderate income. By product, the bank's motor vehicle and other unsecured lending to moderate-income individuals exceeded demographics. The bank's borrower distribution of loans is reasonable given the strong banking competition in the AA. Numerous banks compete for consumer loans.

In this AA, the bank made a WYTAP loan totaling $25,000. WYTAP is a flexible lending program that helps people finance assistive technology devices and services with a low interest rate. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Sheridan-Gillette, WY													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	218	59.1	51.9	15,337	42.3	41.2	156	22.0	49.6	12,539	22.8	34.9	91.6
Over $1 Million	105	28.5		18,768	51.8		74	10.5		9,946	18.1		6.5
Revenue Unknown	46	12.5		2,159	6.0		478	67.5		32,485	59.1		1.9
Total	369	100.0		36,263	100.0		708	100.0		54,970	100.0		100.0
By Loan Size													
$100,000 or Less	293	79.4	95.6	11,033	30.4	49.8	584	82.5	94.7	18,811	34.2	47.2	
$100,001 - $250,000	37	10.0	2.2	6,480	17.9	12.9	75	10.6	3.0	12,695	23.1	16.1	
$250,001 - $1 Million	39	10.6	2.2	18,750	51.7	37.3	49	6.9	2.3	23,464	42.7	36.7	
Total	369	100.0	100.0	36,263	100.0	100.0	708	100.0	100.0	54,970	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	187	85.8		6,420	41.9		133	85.3		4,361	34.8		
$100,001 - $250,000	21	9.6		4,129	26.9		10	6.4		1,764	14.1		
$250,001 - $1 Million	10	4.6		4,788	31.2		13	8.3		6,414	51.2		
Total	218	100.0		15,337	100.0		156	100.0		12,539	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses exceeded aggregate lenders' activity in 2019 and was below aggregate lenders' activity in 2020. For both years, the bank's and aggregate lenders' lending activity were below demographic data. According to 2019 and 2020 D&B data, 90.7% and 91.6% of businesses had gross annual revenues of $1 million or less, respectively. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less but made most of its loans in those smaller amounts. The leading aggregate lenders were large national credit card issuers. In 2019 and 2020, the bank made 85.8% and 85.3%, respectively, of its small business loans to small entities for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with several financial institutions for small business loans, including national banks, which include large national credit card lenders, as well as a credit union and regional bank.

The bank's lending to businesses with unknown revenues increased significantly from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program; these loans are designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank originated over 450 PPP loans in amounts of $1.0 million or less, totaling over $30.0 million in this AA. Of those PPP loans, more than half were for

amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

In addition to PPP loans, the bank also originated a $700,000 loan through another SBA loan program. During the evaluation period, the bank made loans totaling over $31.0 million through these programs. For more information on flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 small business lending was generally consistent with the bank's 2019 small business lending.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's HMDA, consumer, and small business loans in the Sheridan-Gillette AA is adequate and does not reveal any unexplained gaps in lending. As mentioned previously, the AA consists of 11 middle-income and four upper-income census tracts. The AA does not include any low- or moderate-income tracts. During the evaluation period, the bank made HMDA, consumer, and small business loans in all tracts in the AA.

Community Development Lending

The bank makes an adequate level of community development loans in the Sheridan-Gillette AA. As shown in the table at right, the bank originated one community development loan for $150,000 during the evaluation period. The loan provided funds to an organization that serves LMI seniors in the AA. The bank's community development loan is responsive to the needs in the AA and is adequate given that opportunities can be limited and other financial institutions also compete for these loans.

Community Development Lending in the Sheridan-Gillette AA		
Purpose	**#**	***$***
Community Service	1	150,000
Total	**1**	**150,000**

INVESTMENT TEST

Overall, the bank made a significant level of qualified investments, including donations, in the Sheridan-Gillette AA. The bank did not make any non-donation investments in the AA, which is adequate given the performance context. Bank management indicated the AA has strong competition in an area with limited investment opportunities. The bank held $100,000 in prior-period bonds, of which half matured or were sold during the evaluation period.

The bank made a significant level of qualified investments in the form of donations as shown in the table at right. The bank's donations primarily benefited organizations supporting community services targeted to LMI individuals. These donations helped local organizations provide critical services and resources to those in need, such as youth and family programs, senior services, health-related services, emergency housing, and food. As shown in the table, the bank also made donations to organizations that support affordable housing and promote economic development. The bank also made impactful donations, especially in light of job

Qualified Investment Donations in the Sheridan-Gillette AA		
Purpose	**#**	***$***
Affordable Housing	3	3,550
Community Service	111	73,269
Economic Development	1	500
Total	**115**	**77,319**

layoffs, supporting basic needs, including health care, emergency housing, and food accessibility, in the AA during the pandemic.

SERVICE TEST

The bank's delivery systems are accessible to residents and businesses throughout the AA, and retail services do not vary in a way that inconveniences particular individuals or areas. The bank provides an adequate level of community development services.

Retail Services

Delivery systems in the AA are accessible to the bank's geographies and to individuals of different income levels. The bank's services do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates five full-service branches and one drive-up facility in the AA, for a total of six offices. The bank operates two branches and the drive-up facility in Sheridan. In addition, the bank operates two branches in Gillette and one branch in Buffalo, which offer drive-up services. The branches have ATMs and most offer extended hours. The bank did not have any branch closures or relocations in this AA during the evaluation period. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the geographic distribution of branches and drive ups in this AA.

Geographic Distribution of Branches
Assessment Area: Sheridan-Gillette, WY

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Middle	**Total**	**5**	**83.3%**	**0**	**0**	**4**	**4**	**2**				
	DTO	1		0	0	1			11	73.3%	68.6%	83.0%
	LS	0		0	0							
Upper	**Total**	**1**	**16.7%**	**0**	**0**	**1**	**1**	**1**				
	DTO	0		0	0	0			4	26.7%	31.4%	17.0%
	LS	0		0	0							

	Total	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
Unknown	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
	Total	**6**	**100.0%**	**0**	**0**	**5**	**5**	**3**				
Totals	DTO	1		0	0	1			15	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank provides an adequate level of community development services in this AA. The table to the right shows the service activity and purpose category during the evaluation period. Seven bank employees provided nine community development services for four organizations. The bank's community development services focused on nonprofit organizations that provide essential services to LMI individuals (including youth and seniors), such as financial education, food, and court representation. Some employees served as instructors and others served as board members for organizations. The bank's services were responsive to meeting certain needs of LMI individuals in the AA.

Community Development Services in the Sheridan-Gillette AA	
Purpose	**#**
Community Services	9
Total	**9**

METROPOLITAN AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHEYENNE, WYOMING MSA ASSESSMENT AREA

The bank operates two branches in this AA that includes the entirety of Laramie County (which is the Cheyenne, WY MSA), in the southeastern portion of the state. This AA is adjacent to the bank's Laramie AA. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHEYENNE ASSESSMENT AREA

Examiners determined that the bank's lending[27] test and service test performance in this AA is consistent with the performance of the full-scope metropolitan AA. The bank's investment test performance exceeds the performance of the full-scope metropolitan AA conclusion based primarily on the level of new investments, including donations.

The bank's qualified investments in this AA are noteworthy. Specifically, the bank made a non-donation investment for $8.6 million that involves a LIHTC project for seniors. The bank also provided an $8.0 million community development loan for this project. The bank's overall involvement in this project is notable.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF WYOMING

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development lending and qualified investments for each AA. The Wyoming state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AA, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review Wyoming MSA AA			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Cheyenne MSA	Consistent	Exceeds	Consistent

[27] Examiners did not include the bank's small farm or small business loans in the analysis because they are not a major business line for this AA.

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON, WYOMING ASSESSMENT AREA

The bank operated three branches in this AA for most of the evaluation period. The bank closed one of the three branches in August 2020. This AA includes the entirety of Teton County, in the western portion of the state, and is adjacent to the bank's Riverton WY AA and Bozeman MT AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA

Examiners determined the bank's lending,[28] service, and investment test performance in this AA is consistent with the performance of the full-scope nonmetropolitan AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LARAMIE, WYOMING ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Albany County, in the southeastern portion of the state. This AA is adjacent to the bank's Cheyenne MSA AA. The bank's branch in this AA is in a moderate-income tract. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LARAMIE ASSESSMENT AREA

Examiners determined the bank's lending[29] test performance in this AA is consistent with the performance of the full-scope nonmetropolitan AA. The bank's service test and investment test performance in this AA exceeds the performance of the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is based on the level of investments, including donations. The bank's service test performance conclusion in this AA is primarily based on the accessibility of delivery systems and level of community development services.

The bank's community development lending and investments in this AA are noteworthy. The bank made several community development loans totaling $8.0 million that support affordable housing and revitalization or stabilization in the AA, including a new LIHTC project for seniors. The bank made an excellent level of investments, including one for $8.5 million that involves the same LIHTC project for seniors. The bank's overall involvement in this project is notable.

[28] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.
[29] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RIVERTON, WYOMING ASSESSMENT AREA

The bank operates two branches and a drive-up facility in this AA that includes the entirety of Fremont County, in the western portion of the state. One of the bank's branches and the drive-up facility are very near a moderate-income tract. This AA is adjacent to the bank's Casper MSA and Jackson AAs. This AA includes a large portion of the Wind River Indian Reservation. The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RIVERTON ASSESSMENT AREA

Examiners determined the bank's lending test performance in this AA is consistent with the performance of the full-scope nonmetropolitan AA. The bank's investment and service test performance in this AA exceeds the performance of the full-scope nonmetropolitan AA. The bank's investment test conclusion in this AA is based on the level of new investments, including donations.

The bank's community development lending in this AA is noteworthy. The bank made community development loans totaling $1.8 million, which primarily support revitalization or stabilization of certain geographies, during the evaluation period. The bank also made a $2.9 million NMTC investment in this AA, which is notable.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF WYOMING

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Wyoming state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AAs, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Wyoming AAs			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Jackson	Consistent	Consistent	Consistent
Laramie	Consistent	Exceeds	Exceeds
Riverton	Consistent	Exceeds	Exceeds

SOUTH DAKOTA

CRA RATING FOR South Dakota: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the South Dakota AAs shows excellent responsiveness to local credit needs.
- The lending to businesses of different sizes and to LMI borrowers is good.
- Overall, the geographic distribution of loans throughout the AAs is adequate.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of flexible loan programs in its South Dakota branches.
- By number and dollar amount, the bank has a significant level of qualified investments, which exhibits good responsiveness to credit and community development needs.
- Bank retail services are readily accessible to businesses and residents throughout the AAs. The bank also provides a relatively high level of community development services in its South Dakota AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for South Dakota is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Rapid City-Spearfish, SD CSA AA; the performance in this AA was the primary driver for the state rating.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Belle Fourche and Custer-Hot Springs AAs in South Dakota. Examiners evaluated whether the bank's performance in the limited-scope nonmetropolitan AAs was consistent with the bank's state performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA

Assessment Area Information. During this evaluation period, the bank had three AAs in South Dakota. The bank changed the delineation of all three AAs from 2018 to 2019 in response to MSA and CSA composition changes by the OMB. While the three AAs changed, overall, the counties comprising the AAs remain the same since counties shifted among the existing AAs. More detailed descriptions of the bank's AAs are located in their respective sections.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks 12th among 78 financial institutions operating in South Dakota, with a 0.1% deposit market share and $1.0 billion in deposits. Deposits in South Dakota account for 7.5% of the bank's overall deposits. The bank operates in competitive banking environments in its South Dakota AA, with varying types of financial institutions and creditors seeking out loans, as well as deposits.

Based on 2020 FFIEC adjusted census data, the South Dakota AAs include 39 census tracts: one low-, six moderate-, 26 middle-, and six upper-income census tracts. None of the census tracts in the South Dakota AAs were classified as distressed or underserved during the evaluation period.

The bank's South Dakota AAs do not include any American Indian reservations. However, two reservations border portions of the bank's AAs. The Cheyenne River Indian Reservation borders the northeastern portion of Meade County, which is part of the Rapid City-Spearfish, SD CSA AA. Parcels of noncontiguous tribal trust land of the Cheyenne River Indian Reservation and the Northern Cheyenne Indian Reservation are located in Meade County. The Pine Ridge Indian Reservation boarders on the eastern portion of Custer and Fall River counties, which comprise the Custer-Hot Springs AA.

Population. According to 2020 FFIEC adjusted census data, the total population of South Dakota is 843,190, of which 182,703 individuals reside in the bank's AAs. The bank's South Dakota assessment areas include 21.7% of the state's population. The data also shows that 60.2% of families reside in middle- and upper-income census tracts and that 12.8% are below the poverty level.

General Economic and Housing Information. During the evaluation period, economic conditions were generally good with some challenges. The state fared quite well through the onset of the pandemic as most businesses were open. In addition, tourism in 2020 was a significant driver of the economy; people sought outdoor recreation and campgrounds. Agricultural conditions were somewhat weak during the evaluation period, as prices were low, impact costs were high, and drought conditions prevailed.

Generally, the primary industries in the South Dakota AAs include agriculture, tourism/hospitality, higher education, government, health care, and energy. The AAs also include rural areas, including agricultural land or national forest land.

In South Dakota, the housing demand and prices have increased and the cost to build new homes has also increased. The housing inventory for purchase is considerably low with the housing demand high. Many areas of South Dakota in the bank's AAs experience housing demand from people relocating from out of state; that trend increased in 2020.

According to the 2020 FFIEC adjusted census data, 60.3% of the housing in the South Dakota AAs was owner-occupied, 27.1% was rental, and 12.6% was vacant. The median housing value was $159,980 for the South Dakota AAs, with the lowest value at $102,800 in Fall River County. Custer County has the highest median housing value at $208,900. The median age of the housing stock in the South Dakota AAs was 43 years. Meade and Custer counties had the lowest median age of housing stock at 30 and 31 years, respectively. Butte and Fall River counties had the highest median age of housing stock at 42 years. Affordable housing continues to be a considerable concern throughout the bank's AAs. Community contacts familiar with the Rapid City – Spearfish CSA and rural areas stated that affordable housing continues to be an unmet need in the area.

South Dakota has many large national and regional financial institutions, as well as credit unions, that operate throughout the state. Competition for deposits, loans, and community development activities is strong within the bank's AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

Examiners based the bank's South Dakota evaluation on a full-scope review of the Rapid City-Spearfish, SD CSA AA and limited-scope reviews of the remaining South Dakota AAs. A detailed discussion of the bank's performance in the full scope AA and a shorter discussion of the limited-review AAs follow this

section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for South Dakota is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests.

The Lending Test rating is high satisfactory. The bank's lending activity reflects excellent responsiveness to credit needs throughout the South Dakota AA. The bank's distribution of loans by revenue size and income of borrowers is good. The bank's geographic distribution of loans is also good. The bank made an adequate level of community development loans. The bank continues to make extensive use of flexible loan programs in the AAs.

The Investment Test rating is high satisfactory. Overall, qualified investments, including donations, are significant. The bank has a lack of new qualified non-investment donations in the full-scope AA, which is adequate given performance context. The bank has a significant level of donations, demonstrating good responsiveness to community development needs.

The Service Test rating is high satisfactory. The bank's delivery systems are readily accessible to all portions of the South Dakota AAs. The bank provides a relatively high level of community development services, and bank officers and employees support organizations dedicated to community development initiatives.

LENDING TEST

The Lending Test rating is high satisfactory for South Dakota.

Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its South Dakota AAs. The table below shows the bank's lending in its South Dakota AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the South Dakota Assessment Areas

Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	1,445	13.8	281,735	41.7
Small Business-reportable	2,613	25.0	214,359	31.7
Small Farm-reportable	1,060	10.2	67,010	9.9
Consumer-optional reportable	5,317	51.0	112,797	16.7
Total Loans	10,435	100.0	675,901	100.0

The South Dakota AAs account for 13.5% by number and 8.6% by amount of the bank's lending activity during the evaluation period. Small business lending activity significantly increased from 2019 to 2020, primarily due to the bank's PPP lending. In addition, HMDA lending also increased significantly from 2019 to 2020 due to the low interest rate environment.

The bank continues to be among lending leaders in the areas it serves for HMDA, consumer, small business, and small farm lending. For small business and small farm lending, the bank was the number one lender for each year of the evaluation period for the Rapid City-Spearfish CSA and nonmetropolitan AAs. For HMDA loans, the bank was consistently within the top 10 lenders for each year of the evaluation period in the Rapid City-Spearfish CSA and the nonmetropolitan AAs.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the AAs. In addition, the geographic distribution of loans is adequate. The bank extends loans in census tracts of all income levels, including low- and moderate-income tracts.

During the evaluation period, the bank made loans through flexible loans programs totaling approximately $87.2 million in its South Dakota AAs (primarily including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Rapid City-Spearfish SD, CSA AA. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

Community Development Loans

The bank makes an adequate level of community development loans in the South Dakota AAs. As shown in the table at right, the bank renewed two community development loans totaling $1.4 million, which supported affordable housing in the Rapid City-Spearfish CSA AA.

South Dakota Community Development Loans		
Purpose	**#**	***$***
Affordable Housing	2	1,365,000
Total	**2**	1,365,000

Overall, the bank's community development lending demonstrates adequate responsiveness to the needs of the bank's assessment areas.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for South Dakota. The bank has an overall significant level of qualified investments, including donations, demonstrating good responsiveness to credit and community development needs.

The bank did not make new non-donation investments in the South Dakota AAs or in regional or statewide areas that include those AAs during the evaluation period, which is adequate. The bank held six prior-period qualified investments totaling approximately $2.5 million in the South Dakota AAs. The investments helped revitalize and stabilize underserved, distressed, and moderate-income areas. These bonds continued to finance essential infrastructure in the Belle Fourche, Custer-Hot Springs, and Rapid City-Spearfish CSA AAs. In addition, the bank continues to hold seven prior-period investments totaling approximately $2.8 million that benefited the state of South Dakota. These bonds continued to support economic development and revitalization and stabilization of eligible areas.

Examiners can also consider any qualified community development investments benefiting geographies outside the bank's South Dakota AAs. The bank has one prior-period $750,000 investment that supports economic development in areas of South Dakota outside the AAs.

Donations. The bank made a significant level of donations during the evaluation period, totaling $262,173. Of those donations, 51.1% directly benefitted the South Dakota AAs (primarily the Rapid City-Spearfish CSA AA). The remaining 48.9% of the donations benefited broader regional or statewide areas that include its AAs. The following table shows the distribution of donations by AA, as well as by regional and statewide areas.

South Dakota Qualified Investment Donations		
Assessment Area	**Total**	
	#	**$**
Rapid City-Spearfish CSA	88	116,918
Belle Fourche	13	8,791
Custer-Hot Springs	14	8,375
Regional SD	51	112,589
Statewide SD	8	15,500
Total	174	$262,173

The bank made most of its donations, by number and dollar, in the Rapid City-Spearfish CSA AA and in regional areas of South Dakota that include the bank's AAs. Most donations were to organizations that provide services to LMI individuals. The bank also made significant donations that support affordable housing, a significant need in the AA, and revitalization and stabilization of disaster areas. Two large donations in 2020 helped organizations meet pandemic-related needs, including food insecurity and telehealth services. The bank's donations show good responsiveness to the needs of the AAs, as well as the broader and regional areas in the AAs.

Because the bank's donations address needs in its South Dakota AAs, examiners also considered the bank's donations benefiting areas outside of its South Dakota AAs. The bank made three such donations totaling $4,000. These donations support organizations that provide services to LMI individuals. The table above does not include these donations.

SERVICE TEST

The Service Test rating is high satisfactory for South Dakota. Delivery systems are readily accessible to all portions of the South Dakota AAs. Branch and ATM changes have not adversely affected the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences LMI geographies or individuals. Finally, the bank provides a relatively high level of community development services in the South Dakota AAs.

Retail Banking Services

The bank's delivery systems are readily accessible to residents and businesses throughout the South Dakota AAs, and services do not vary in a way that inconveniences certain geographies or individuals. The bank operates 14 full-service branches with ATMs in South Dakota. Most branches include a drive-thru. The bank also operates 19 ATMs in the state. Since the previous evaluation, the bank closed one

drive-thru facility with a drive-up ATM located in Custer during the evaluation period. The closure did not adversely affect the accessibility of its delivery systems to low- and moderate-income geographies or individuals. The following table shows the bank's distribution of offices and drive-up facilities (if applicable) as of 2020.[30]

Geographic Distribution of Branches
Assessment Areas: State of South Dakota

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			1	2.6%	0.3%	0.3%
	LS	0		0	0							
Moderate	**Total**	**2**	**14.3%**	**0**	**0**	**2**	**2**	**2**				
	DTO	0		0	0	0			6	15.4%	12.7%	14.2%
	LS	0		0	0							
Middle	**Total**	**9**	**64.3%**	**0**	**1**	**8**	**3**	**6**				
	DTO	0		0	1	0			26	66.7%	68.8%	68.6%
	LS	0		0	0							
Upper	**Total**	**3**	**21.4%**	**0**	**0**	**3**	**2**	**3**				
	DTO	0		0	0	0			6	15.4%	18.2%	16.9%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**14**	**100.0%**	**0**	**1**	**13**	**7**	**11**				
	DTO	0		0	1	0			39	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, the bank has 14.3% of its branches in moderate-income census tracts. The percentage of the bank's branches in low-income tracts is comparable to demographics, as 15.4% of the

[30] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within 1 mile of their prior location are not shown in the table.

tracts in the South Dakota AAs are moderate-income tracts. The bank does not have a branch in the low-income tract, which is just over five miles to the nearest branch. The one low-income tract makes up only 2.6% of the AA.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank provides a relatively high level of community development services in the South Dakota AAs. The table below shows the distribution of community development services by type of activity and assessment area.

South Dakota Community Development Services					
Assessment Area	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize or Stabilize***	***Total***
Rapid City-Spearfish CSA	4	31	3	0	38
Belle Fourche	0	8	0	0	8
Custer-Hot Springs	0	18	0	0	18
Edgemont (2018 only)	1	1	0	0	2
Regional South Dakota	8	16	0	0	24
State of South Dakota	0	3	1	0	4
Totals	**13**	**77**	**4**	**0**	**94**

Many bank officers and employees provided their financial expertise to organizations that provide community services to low- and moderate-income individuals and families. During the evaluation period, employees also provided services to organizations that support affordable housing and economic development initiatives and projects. Bank employees served in a variety of roles, including board member, president, and committee members.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RAPID CITY-SPEARFISH, SD CSA, 16940

Bank Information. The bank operated 10 full-service branches during the evaluation period in the Rapid City-Spearfish, SD CSA AA. All offices have ATMs and nearly all have drive-up facilities. The bank also continues to operate several stand-alone ATMs in the AA. The bank changed the delineation of this AA, as well as its other South Dakota AAs, due to 2018 OMB MSA boundary updates. As a result, four of the bank's existing branches in Lawrence County (previously part of the Belle Fourche AA), one in Lead, two in Spearfish, and one in Deadwood became part of this AA. In addition, one branch and one drive-through facility located in Custer County moved out of this AA and became part of the Custer-Hot Springs AA.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked second among 12 FDIC-insured institutions operating in the Rapid City-Spearfish, SD CSA, with an 18.5% deposit market share and $754.7 million in deposits. The deposits in this AA represent 5.7% of the bank's overall deposits. The bank competes with various types of financial institutions and other creditors locally, including community banks, regional banks, large national banks, and credit unions, as well as an agricultural creditor.

Assessment Area Information. The Rapid City-Spearfish CSA AA is in western South Dakota. As mentioned previously, this AA changed during the evaluation period. In 2018, this AA (then the Rapid City MSA AA) followed the boundaries of the Rapid City MSA, which was Meade, Pennington, and Custer counties. Effective as of 2019, this AA consists of Meade, Pennington, and Lawrence counties (the Rapid City-Spearfish, SD CSA in its entirety). The bank's changes were in response to OMB changes to MSA boundary delineations. Specifically, the bank removed Custer County from this AA when the OMB removed Custer County from the Rapid City, SD MSA. The bank then added Custer County to the AA now known as Custer-Hot Springs AA (formerly the Edgemont, SD AA comprised of Fall River County). At the same time, the bank added Lawrence County, which comprises the Spearfish, SD Micropolitan area, to this AA. Lawrence County and the Rapid City, SD MSA together are the Rapid City-Spearfish, SD CSA. Lawrence County was part of the bank's Belle Fourche AA prior to this change. The Rapid City-Spearfish CSA AA is adjacent to the Belle Fourche and Custer-Hot Springs AAs.

Given the modifications to the AA delineation, the census tract composition of the AA changed. In 2018, the Rapid City MSA AA had one low-, six moderate-, 18 middle-, and five upper-income census tracts. In 2019 and 2020, the Rapid City-Spearfish CSA AA had one low-, six moderate-, 20 middle-, and six upper-income census tracts.

The Rapid City-Spearfish CSA AA is geographically diverse and includes urban and rural areas, as well as agricultural land and national park and forest land. The Cheyenne River and Pine Ridge Indian Reservations border the northeastern and southeastern portions of the AA, respectively. Parcels of noncontiguous Tribal trust land of the Cheyenne River Indian Reservation and the Northern Cheyenne Indian Reservation are located in Meade County. Meade County and to the east of Rapid City in Pennington County is primarily rural agricultural land. Mount Rushmore National Memorial and a portion of Badlands National Park are in Pennington County. A portion of Black Hills National Forest is in Pennington, Lawrence, and Meade counties. Ellsworth AFB is also located in a portion of Meade and Pennington counties.

The following Combined Demographics Report provides demographic information, including the census tract composition for 2019 and 2020, for this AA, based on 2020 FFIEC adjusted census data and 2020 D&B data.[31]

Combined Demographics Report

2020 Rapid City-Spearfish, SD CSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.0	188	0.5	75	39.9	7,611	18.8
Moderate	6	18.2	4,947	12.2	884	17.9	7,785	19.2
Middle	20	60.6	25,861	63.7	1,860	7.2	8,790	21.7
Upper	6	18.2	9,587	23.6	463	4.8	16,397	40.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**33**	**100.0**	**40,583**	**100.0**	**3,282**	**8.1**	**40,583**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	281	24	0.1	8.5	229	81.5	28	10.0
Moderate	10,179	4,542	10.7	44.6	4,824	47.4	813	8.0
Middle	44,432	26,972	63.3	60.7	12,791	28.8	4,669	10.5
Upper	15,858	11,041	25.9	69.6	2,368	14.9	2,449	15.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**70,750**	**42,579**	**100.0**	**60.2**	**20,212**	**28.6**	**7,959**	**11.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	34	0.4	31	0.4	3	0.4	0	0.0
Moderate	1,505	17.5	1,321	17.0	177	24.6	7	7.4
Middle	5,285	61.6	4,777	61.5	446	62.0	62	66.0
Upper	1,757	20.5	1,639	21.1	93	12.9	25	26.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8,581**	**100.0**	**7,768**	**100.0**	**719**	**100.0**	**94**	**100.0**
Percentage of Total Businesses:				**90.5**		**8.4**		**1.1**

[31]The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects OMB revised MSA delineations as applicable.

Combined Demographics Report								
2020 Rapid City-Spearfish, SD CSA AA Demographics								
	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	11	2.8	9	2.3	1	33.3	1	100.0
Middle	332	83.6	331	84.2	1	33.3	0	0.0
Upper	54	13.6	53	13.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**397**	**100.0**	**393**	**100.0**	**3**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.0**		**0.8**		**0.3**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Rapid City-Spearfish SD MSA, as well as family incomes for the nonmetropolitan areas of South Dakota, for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Rapid City-Spearfish, SD MSA					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$71,900**	0 - $35,949	$35,950 - $57,519	$57,520 - $86,279	$86,280 - & above
2019	**$67,900**	0 - $33,949	$33,950 - $54,319	$54,320 - $81,479	$81,480 - & above
2020	**$69,200**	0 - $34,599	$34,600 - $55,359	$55,360 - $83,039	$83,040 - & above

Borrower Income Levels Nonmetropolitan Areas of South Dakota					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	**$66,500**	0 - $33,249	$33,250 - $53,199	$53,200 - $79,799	$79,800 - & above
2020	**$68,900**	0 - $34,449	$34,450 - $55,119	$55,120 - $82,679	$82,680 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Rapid City-Spearfish, SD MSA, which was $63,776 for 2018, and $63,471 for 2019 and 2020. For the nonmetropolitan areas of South Dakota, this figure was $60,845 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the AA population is 157,111. Pennington County is home to 67.5% of the AA's population. Most people in the AA (51.9%) are between the ages of 25 and 64 years, according to the adjusted census data. The remaining population is as follows: 23.3% is 17 years and younger, 9.9% is 18 to 24 years, and 14.9% is 65 years and over. The data also indicates that 11.8% of households in the assessment area are below the poverty level.

Housing Information. Based on 2020 FFIEC adjusted census data, this AA has 70,750 housing units: 60.2% are owner-occupied, 28.6% are rental, and 11.3% are vacant. The median age of the housing stock is 42 years, which is slightly higher than the statewide median age of 40 years. The AA's median housing value is $162,771, compared to $140,500. The AA's affordability ratio is 31.0%, compared to 36.3% for the state. The affordability ratio is the median household income divided by the median housing value; a higher ratio indicates greater affordability. These ratios suggest that the housing in the AA is not as affordable compared to other areas in the state.

Bank management stated that a recent national study designated Rapid City as the second hottest real estate market in the county. During the evaluation period, home prices in the AA increased and construction of some housing developments stalled due to a lack of laborers for the projects. Bank management and community contacts stated that housing inventory, including affordable housing, in the area is limited and continues to be a major concern. Bank management noted a need for lower-income housing as well as workforce housing. A housing study found the Rapid City MSA to be 3,500 units short of current housing needs, according to bank management. Significant population growth is expected in the next five years due to the announced future production of the B-21 Raider Stealth Bomber at the AFB, 10 miles north of Rapid City, which will also require housing for the servicemember workforce. This bomber program will employ more than 3,000 service men and women.

The table below shows the housing cost burden in the AA, the MSA, counties comprising the AA, nonmetropolitan areas of South Dakota, and the state of South Dakota, for individuals of different income levels. In comparison to the collective nonmetropolitan areas of South Dakota and the state of South Dakota, cost burden for LMI renters and homeowners (in the AA and the areas comprising the AA) is high and exceeds HUD's 30% cost-burden threshold. The exception to the high-cost burden is moderate-income renters in Lawrence County, whose cost burden is below the HUD threshold. Low-income individuals in the AA face the most significant housing cost burden.

Rapid City-Spearfish, SD CSA AA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Rapid City-Spearfish, SD CSA	69.5%	38.7%	41.1%	63.2%	38.3%	20.7%
Lawrence County, SD	58.5%	20.3%	32.2%	63.3%	41.3%	22.2%
Meade County, SD	57.1%	64.7%	37.1%	65.9%	38.6%	22.6%
Pennington County, SD	74.7%	40.5%	44.4%	62.2%	37.5%	19.7%
NonMSA South Dakota	61.8%	12.8%	32.6%	52.4%	21.6%	15.2%
Rapid City, SD MSA	72.0%	44.1%	43.2%	63.2%	37.8%	20.4%
South Dakota	66.2%	20.3%	35.1%	55.7%	26.3%	15.6%
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						

General Economic and Business Characteristics. According to bank management and community contacts, economic conditions were generally strong during the evaluation period despite the onset of the pandemic. The main industries in the AA are tourism, government, manufacturing, health care, agriculture, technology, and education. Major employers include Ellsworth Air Force Base, Black Hills Energy, Monument Health, public and secondary school systems, and local, state, and federal government offices. Rapid City continues to be an economic and medical hub for residents in the surrounding areas.

Agriculture (largely feeder cattle and corn) is prevalent in the rural portions of the AA. Bank management stated the agriculture economy was weak during the evaluation period due to drought conditions. Grain and livestock prices were below average, and input costs were on the rise. For example, hay and gasoline were more expensive for producers to purchase. Commodity prices started to slightly increase in 2019 after rainfall. Land prices remained high in the AA.

Bank management and community contacts stated that there were no significant business closures after the onset of the pandemic and wages increased in 2020. According to a community contact, the area generally remained open for business, which helped maintain a good economy. Local businesses, including hospitality and tourism-related businesses (except hotels), experienced growth during the pandemic. Many people sought outdoor recreation and activities that included traveling to the Badlands National Park and Mount Rushmore Memorial, which brought traffic to the area.

The annual average unemployment rates for the AA were generally comparable to the rates in the state of South Dakota in 2018 and 2019 and slightly higher than the state rate in 2020. The following table provides the annual average unemployment rates for the AA, the MSA, counties in the AA, the nonmetropolitan areas of South Dakota, and the state of South Dakota. Bank management indicated that unemployment rates in 2020 increased due to the impact of the pandemic and declined rather quickly in the latter part of 2020.

Annual Average Unemployment Rates			
Area	**2018**	**2019**	**2020**
Rapid City-Spearfish, SD CSA	2.9%	3.1%	5.4%
Lawrence County, SD	2.8%	2.9%	6.2%
Meade County, SD	3.2%	3.3%	4.9%
Pennington County, SD	2.9%	3.1%	5.3%
NonMSA South Dakota	3.1%	3.2%	4.7%
Rapid City, SD MSA	3.0%	3.1%	5.2%
South Dakota	2.9%	3.0%	4.6%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RAPID CITY-SPEARFISH CSA

The bank's Lending Test performance in the Rapid City-Spearfish, SD CSA AA is good. Lending levels show excellent responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is adequate. The bank makes an adequate level of community development loans. The bank extensively uses flexible loan programs for LMI borrowers and small businesses in the AA to help meet credit needs. Examiners assigned the most weight to consumer and small business loans based on the total number and dollar volume of loans during the evaluation period, followed by HMDA.

The Investment Test performance in this AA is significant. The bank made a significant level of qualified investments that show good responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Bank officers and employees provide a relatively high level of community development services.

LENDING TEST

The bank's Lending Test performance in the Rapid City-Spearfish, SD CSA AA is good.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. For HMDA loans, the bank ranked fifth out of 191 HMDA reporters in 2019 and eighth out of 202 HMDA reporters in 2020. The bank's market share of HMDA lending was 5.2% in 2019 and 4.5% in 2020. For CRA reportable loans, the bank ranked first among 72 CRA reporters in 2019 and first among 94 CRA reporters in 2020. The bank's market share for CRA-reportable loans was 18.7% in 2019 and higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented 13.5% by number and 8.6% by dollar amount of the bank's overall HMDA, consumer, small business, and small farm loan originations. Within the South Dakota AAs, lending activity in the Rapid City-Spearfish CSA AA represented 73.4% by number and 77.3% by dollar amount of the bank's total lending.

Distribution by Borrower Income Level and by Size of Businesses and Farms

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. At the product level, examiners evaluated home purchase, refinance, and home improvement loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Rapid City-Spearfish, SD CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	5	3.6	3.7	393	1.5	2.1	6	5.0	3.9	512	1.7	2.1	18.8
Moderate	22	15.9	18.2	3,003	11.1	13.7	15	12.6	20.0	2,365	8.0	15.1	19.2
Middle	36	26.1	23.7	6,647	24.6	21.7	13	10.9	22.0	2,918	9.9	20.0	21.7
Upper	59	42.8	36.2	14,902	55.1	43.7	70	58.8	35.8	20,964	70.9	44.3	40.4
Unknown	16	11.6	18.2	2,098	7.8	18.7	15	12.6	18.4	2,816	9.5	18.6	0.0
Total	138	100.0	100.0	27,043	100.0	100.0	119	100.0	100.0	29,575	100.0	100.0	100.0
Refinance Loans													
Low	4	3.8	4.3	322	1.6	2.2	8	3.3	2.2	832	1.5	1.2	18.8
Moderate	10	9.4	13.0	1,063	5.4	9.0	22	9.2	9.9	3,199	5.8	6.5	19.2
Middle	20	18.9	17.2	2,577	13.2	14.6	37	15.5	16.2	5,709	10.3	13.6	21.7
Upper	56	52.8	35.0	11,859	60.6	40.7	146	61.1	36.7	39,598	71.5	42.5	40.4
Unknown	16	15.1	30.6	3,756	19.2	33.4	26	10.9	34.9	6,051	10.9	36.1	0.0
Total	106	100.0	100.0	19,577	100.0	100.0	239	100.0	100.0	55,389	100.0	100.0	100.0
Home Improvement Loans													
Low	1	4.3	6.3	10	0.8	3.1	2	3.4	5.6	60	0.8	2.9	18.8
Moderate	3	13.0	15.5	60	4.9	12.8	4	6.9	11.6	360	4.9	8.5	19.2
Middle	6	26.1	27.4	420	34.6	23.4	9	15.5	24.6	876	12.0	20.8	21.7
Upper	11	47.8	48.0	681	56.1	58.1	40	69.0	55.0	5,825	80.0	65.4	40.4
Unknown	2	8.7	2.8	43	3.5	2.6	3	5.2	3.2	160	2.2	2.4	0.0
Total	23	100.0	100.0	1,214	100.0	100.0	58	100.0	100.0	7,281	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	11	3.5	4.0	745	1.5	2.2	16	3.5	2.9	1,404	1.5	1.6	18.8
Moderate	37	11.9	15.8	4,187	8.2	11.8	45	9.8	13.5	6,064	6.3	9.9	19.2
Middle	70	22.4	21.2	9,928	19.5	19.0	67	14.6	18.5	9,907	10.3	16.2	21.7
Upper	157	50.3	36.6	29,906	58.9	43.0	280	61.0	36.8	69,127	71.9	43.7	40.4
Unknown	37	11.9	22.3	6,022	11.9	24.0	51	11.1	28.2	9,635	10.0	28.6	0.0
Total	312	100.0	100.0	50,788	100.0	100.0	459	100.0	100.0	96,137	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Rapid City-Spearfish, SD CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	2.3	1.1	20	0.8	0.2	0	0.0	2.5	0	0.0	2.7	18.8
Moderate	2	4.7	6.4	61	2.3	2.9	4	9.5	10.1	140	3.8	7.1	19.2
Middle	8	18.6	16.0	284	10.7	7.0	8	19.0	16.5	404	10.9	10.7	21.7
Upper	30	69.8	73.4	2,228	84.0	88.1	24	57.1	60.8	2,740	74.1	74.7	40.4
Unknown	2	4.7	3.2	60	2.3	1.8	6	14.3	10.1	413	11.2	4.9	0.0
Total	43	100.0	100.0	2,653	100.0	100.0	42	100.0	100.0	3,697	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.0	0	0.0	5.0	0	0.0	2.2	0	0.0	1.9	18.8
Moderate	0	0.0	7.5	0	0.0	2.1	0	0.0	6.7	0	0.0	2.6	19.2
Middle	0	0.0	19.4	0	0.0	21.3	0	0.0	26.7	0	0.0	20.1	21.7
Upper	1	50.0	49.3	236	78.4	53.9	0	0.0	55.6	0	0.0	69.0	40.4
Unknown	1	50.0	14.9	65	21.6	17.7	0	0.0	8.9	0	0.0	6.4	0.0
Total	2	100.0	100.0	301	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.8
Moderate	0	0.0	3.6	0	0.0	4.1	0	0.0	0.0	0	0.0	0.0	19.2
Middle	0	0.0	1.8	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	1.8	0	0.0	5.3	0	0.0	0.0	0	0.0	0.0	40.4
Unknown	0	0.0	92.7	0	0.0	89.3	1	100.0	100.0	195	100.0	100.0	0.0
Total	0	0.0	100.0	0	100.0	100.0	1	100.0	100.0	195	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

For 2019 and 2020, the bank's overall level of HMDA lending to low-income borrowers was comparable to aggregate lenders and below demographics. For those same years, the bank's overall level of HMDA lending to moderate-income borrowers was below aggregate lenders and demographics. The bank's overall HMDA lending is reasonable. At the product level, for moderate-income borrowers, the bank's 2019 home purchase and home improvement lending and 2020 refinance lending were comparable to aggregate lenders' activity; home purchase and refinance loans represented the largest number volume of lending for those respective years. Based on 2019 and 2020 FFIEC adjusted census data, 18.8% of the families in the AA are low income and 19.2% are moderate income. The bank's lending to LMI borrowers is reasonable given aggregate lenders' performance and other performance context. The bank operates in a competitive market for HMDA loans. Various types of creditors compete for mortgage loans, including community and regional banks, large national banks, mortgage companies, and credit unions. In addition, the AA has affordability issues as discussed below.

Bank management and a community contact stated that homeownership is generally unaffordable for LMI individuals and housing prices increased during the evaluation period. As an example of the price

increases, bank management noted that the average single-family home price in the AA was $263,000 in 2018 and climbed to $294,000 in 2020, with some areas having higher prices (with increases to $350,000 in 2020). In addition, the AA has limited housing inventory, including affordable homes. Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, an individual with the highest income in the low-income bracket ($34,599) could afford a $103,797 home, based on the 2020 FFIEC estimated median family income of $69,200 for the Rapid City-Spearfish CSA. Using the same assumption for a borrower with the highest income in the moderate-income bracket ($55,359), a borrower could afford a $166,077 home. According to the 2020 adjusted FFIEC census data, the median housing value in the assessment area is $162,771. This data suggests that homeownership would not be affordable for many LMI borrowers.

In this AA, the bank made extensive use of flexible lending programs to help meet the needs of LMI borrowers. During the evaluation period, the bank participated in Fannie Mae HomeReady and SDHDA programs, which help borrowers finance homes (including closing cost and downpayment assistance), as well as FHA and VA programs. The bank's loans through these programs totaled approximately $17.9 million in the AA, which is noteworthy given the affordability issues. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

The bank's 2018 HMDA lending performance was generally consistent with the bank's 2019 and 2020 HMDA lending performance.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Rapid City-Spearfish, SD CSA

	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	1	0.1%	27	0.1%	71	8.1%	1,064	5.3%
Moderate	70	8.0%	1,491	7.4%	164	18.7%	2,859	14.2%
Low/Moderate Total	71	8.1%	1,518	7.5%	235	26.8%	3,923	19.4%
Middle	642	73.2%	14,645	72.6%	217	24.7%	4,827	23.9%
Upper	164	18.7%	4,023	19.9%	419	47.8%	11,324	56.1%
Unknown	0	0.0%	0	0.0%	6	0.7%	112	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	877	100.0%	20,186	100.0%	877	100.0%	20,186	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	22	8.5%	269	4.1%
Moderate	10	3.8%	116	1.8%	42	16.2%	678	10.2%
Low/Moderate Total	10	3.8%	116	1.8%	64	24.6%	947	14.3%
Middle	193	74.2%	4,959	74.8%	53	20.4%	1,217	18.4%
Upper	57	21.9%	1,551	23.4%	135	51.9%	4,100	61.9%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Rapid City-Spearfish, SD CSA								
Unknown	0	0.0%	0	0.0%	8	3.1%	362	5.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	260	100.0%	6,626	100.0%	260	100.0%	6,626	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	30	18.6%	199	6.5%
Moderate	4	2.5%	70	2.3%	47	29.2%	428	14.0%
Low/Moderate Total	4	2.5%	70	2.3%	77	47.8%	627	20.6%
Middle	109	67.7%	1,651	54.1%	29	18.0%	338	11.1%
Upper	48	29.8%	1,329	43.6%	49	30.4%	2,006	65.8%
Unknown	0	0.0%	0	0.0%	6	3.7%	79	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	161	100.0%	3,050	100.0%	161	100.0%	3,050	100.0%
	Consumer Loan Totals							
Low	1	0.1%	27	0.1%	123	9.5%	1,532	5.1%
Moderate	84	6.5%	1,677	5.6%	253	19.5%	3,965	13.3%
Low/Moderate Total	85	6.5%	1,704	5.7%	376	29.0%	5,497	18.4%
Middle	944	72.7%	21,255	71.2%	299	23.0%	6,382	21.4%
Upper	269	20.7%	6,903	23.1%	603	46.5%	17,430	58.4%
Unknown	0	0.0%	0	0.0%	20	1.5%	553	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,298	100.0%	29,862	100.0%	1,298	100.0%	29,862	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Rapid City-Spearfish, SD CSA								
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Motor Vehicle							
Low	1	0.1%	73	0.4%	58	7.9%	1,005	5.5%
Moderate	59	8.0%	1,382	7.5%	150	20.4%	3,092	16.9%
Low/Moderate Total	60	8.2%	1,455	7.9%	208	28.3%	4,097	22.3%
Middle	531	72.2%	13,106	71.4%	173	23.5%	3,878	21.1%
Upper	144	19.6%	3,786	20.6%	352	47.9%	10,328	56.3%
Unknown	0	0.0%	0	0.0%	2	0.3%	44	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	735	100.0%	18,347	100.0%	735	100.0%	18,347	100.0%
	Other - Secured							
Low	1	0.4%	22	0.4%	11	4.6%	109	1.8%
Moderate	7	2.9%	209	3.5%	46	19.3%	794	13.2%
Low/Moderate Total	8	3.4%	231	3.8%	57	23.9%	903	15.0%
Middle	168	70.6%	3,821	63.6%	48	20.2%	1,109	18.5%
Upper	62	26.1%	1,957	32.6%	125	52.5%	3,749	62.4%

Unknown	0	0.0%	0	0.0%	8	3.4%	248	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	238	100.0%	6,009	100.0%	238	100.0%	6,009	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	17	14.2%	182	6.6%
Moderate	2	1.7%	28	1.0%	20	16.7%	263	9.5%
Low/Moderate Total	2	1.7%	28	1.0%	37	30.8%	445	16.2%
Middle	86	71.7%	1,764	64.1%	24	20.0%	397	14.4%
Upper	32	26.7%	962	34.9%	51	42.5%	1,686	61.2%
Unknown	0	0.0%	0	0.0%	8	6.7%	226	8.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	120	100.0%	2,754	100.0%	120	100.0%	2,754	100.0%
	Consumer Loan Totals							
Low	2	0.2%	95	0.4%	86	7.9%	1,296	4.8%
Moderate	68	6.2%	1,619	6.0%	216	19.8%	4,149	15.3%
Low/Moderate Total	70	6.4%	1,714	6.3%	302	27.6%	5,445	20.1%
Middle	785	71.8%	18,691	68.9%	245	22.4%	5,384	19.9%
Upper	238	21.8%	6,705	24.7%	528	48.3%	15,763	58.1%
Unknown	0	0.0%	0	0.0%	18	1.6%	518	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,093	100.0%	27,110	100.0%	1,093	100.0%	27,110	100.0%

In 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics. For those same years, the bank's overall lending to moderate-income borrowers was comparable to demographics. According to 2019 and 2020 FFIEC adjusted census data, 21.9% of the households in the AA are low income and 17.6% are moderate income. According to 2019 and 2020 FFIEC adjusted census data, 21.9% of the households in the AA are low income and 17.6% are moderate income. By product, the bank's other-unsecured lending to moderate-income borrowers was above demographics for 2019. The bank's level of lending to LMI borrowers is reasonable given the strong competition for consumer loans in the AA by various financial institutions.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Rapid City-Spearfish, SD CSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	320	66.0	49.9	20,385	50.5	44.1	214	19.5	43.8	19,482	22.4	34.9	90.5
Over $1 Million	115	23.7		17,140	42.4		115	10.5		18,408	21.1		8.4
Revenue Unknown	50	10.3		2,873	7.1		767	70.0		49,250	56.5		1.1
Total	485	100.0		40,398	100.0		1,096	100.0		87,140	100.0		100.0
By Loan Size													
$100,000 or Less	389	80.2	90.3	13,158	32.6	32.8	895	81.7	85.3	26,841	30.8	27.8	
$100,001 - $250,000	60	12.4	5.0	10,359	25.6	17.9	118	10.8	7.5	19,233	22.1	18.0	
$250,001 - $1 Million	36	7.4	4.7	16,881	41.8	49.3	83	7.6	7.2	41,066	47.1	54.2	
Total	485	100.0	100.0	40,398	100.0	100.0	1,096	100.0	100.0	87,140	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	273	85.3		8,238	40.4		171	79.9		5,291	27.2		
$100,001 - $250,000	31	9.7		5,522	27.1		24	11.2		4,096	21.0		
$250,001 - $1 Million	16	5.0		6,625	32.5		19	8.9		10,095	51.8		
Total	320	100.0		20,385	100.0		214	100.0		19,482	100.0		
Source: 2020 FFIEC Census Data													
2020 Dun & Bradstreet Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

The bank's lending to small businesses was below demographics in 2019 and 2020, as was the aggregate lenders' lending. In 2019 and 2020, the bank's lending performance was below aggregate lenders. The bank originated 66.0% and 19.5% of its loans to small businesses during 2019 and 2020, respectively, while aggregate lenders originated 49.9% and 43.8% of their loans to small businesses. According to 2019 and 2020 D&B data, 90.3% and 90.5% of business had gross annual revenues of $1 million or less, respectively. The bank was below aggregate lenders when extending loan amounts for $100,000 or less but made most of its loans in those smaller amounts. In 2019 and 2020, the bank made 85.3% and 79.9%, respectively, of its small business loans to small entities for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with several financial institutions for small business loans; primary competitors include large regional and national banks, including some national credit card lenders. Despite the strong competition, the bank was ranked first for market share out of 72 lenders in 2019 and 94 lenders in 2020.

The bank's lending to businesses with unknown revenue increased from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program. These loans are designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank originated over 680 PPP loans (in amounts of $1.0 million or less)

totaling over $41.3 million in this AA, of which more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

In addition to PPP loans, the bank also originated loans totaling $2.1 million through another SBA loan program, as well as a USDA program. During the evaluation period, the bank made loans totaling approximately $43.4 million through these programs. For more information on flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 small business lending was generally consistent with the bank's 2019 small business lending.

Geographic Distribution

Overall, the bank's geographic distribution of loans reflects adequate dispersion among borrowers of different income levels and businesses of different sizes and does not reveal any unexplained gaps in lending. The AA has one low-income and six moderate-income census tracts. In addition, the AA includes 20 middle-income and six upper-income tracts.

Residential Real Estate. The geographic distribution of HMDA loans is adequate. The following tables show the distribution of the bank's 2019 and 2020 HMDA loan data by census tract income level. The tables also include aggregate lending data for each year and demographics.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Rapid City-Spearfish, SD CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	0.7	0.4	147	0.5	0.4	0	0.0	0.7	0	0.0	0.6	0.1
Moderate	4	2.9	10.0	440	1.6	6.6	7	5.9	10.2	1,069	3.6	6.5	10.7
Middle	106	76.8	69.3	20,120	74.4	67.7	71	59.7	67.0	16,382	55.4	65.3	63.3
Upper	27	19.6	20.3	6,336	23.4	25.3	41	34.5	22.1	12,124	41.0	27.5	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	138	100.0	100.0	27,043	100.0	100.0	119	100.0	100.0	29,575	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	4	3.8	7.1	584	3.0	4.3	6	2.5	5.5	810	1.5	3.4	10.7
Middle	75	70.8	67.4	12,970	66.3	65.4	149	62.3	65.3	32,295	58.3	61.8	63.3
Upper	27	25.5	25.4	6,023	30.8	30.2	84	35.1	29.2	22,284	40.2	34.7	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	106	100.0	100.0	19,577	100.0	100.0	239	100.0	100.0	55,389	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Rapid City-Spearfish, SD CSA

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.2	0.1
Moderate	0	0.0	7.5	0	0.0	5.1	2	3.4	7.1	65	0.9	3.7	10.7
Middle	18	78.3	65.5	1,054	86.8	59.5	32	55.2	59.0	3,130	43.0	57.9	63.3
Upper	5	21.7	27.0	160	13.2	35.4	24	41.4	33.6	4,086	56.1	38.2	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	1,214	100.0	100.0	58	100.0	100.0	7,281	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	1.5	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	0.9
Moderate	3	42.9	32.8	730	37.2	37.1	3	30.0	32.7	15,722	58.8	22.2	24.5
Middle	2	28.6	58.2	551	28.1	54.8	3	30.0	49.1	10,611	39.7	58.1	59.3
Upper	2	28.6	7.5	681	34.7	6.5	4	40.0	18.2	403	1.5	19.7	15.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,962	100.0	100.0	10	100.0	100.0	26,736	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	0.3	0.3	147	0.3	0.3	0	0.0	0.3	0	0.0	0.2	0.1
Moderate	12	3.8	9.1	1,768	3.4	7.2	19	4.1	7.5	17,731	14.4	5.4	10.7
Middle	230	72.1	68.0	36,402	69.0	65.9	284	60.6	65.5	64,552	52.5	62.9	63.3
Upper	76	23.8	22.7	14,433	27.4	26.5	166	35.4	26.7	40,590	33.0	31.4	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	319	100.0	100.0	52,750	100.0	100.0	469	100.0	100.0	122,873	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2)
Assessment Area: Rapid City-Spearfish, SD CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	1	2.3	3.2	14	0.5	1.5	1	2.4	2.5	65	1.8	1.0	10.7
Middle	28	65.1	50.0	1,471	55.4	36.3	28	66.7	58.2	1,939	52.4	46.2	63.3
Upper	14	32.6	46.8	1,168	44.0	62.2	13	31.0	39.2	1,693	45.8	52.8	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	2,653	100.0	100.0	42	100.0	100.0	3,697	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2) Assessment Area: Rapid City-Spearfish, SD CSA													
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	7.5	0	0.0	2.9	0	0.0	11.1	0	0.0	4.8	10.7
Middle	1	50.0	61.2	236	78.4	57.4	0	0.0	51.1	0	0.0	62.6	63.3
Upper	1	50.0	31.3	65	21.6	39.7	0	0.0	37.8	0	0.0	32.7	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	301	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	14.6	0	0.0	12.4	0	0.0	10.9	0	0.0	7.3	10.7
Middle	0	0.0	70.9	0	0.0	71.8	1	100.0	67.4	195	100.0	69.1	63.3
Upper	0	0.0	14.6	0	0.0	15.8	0	0.0	21.7	0	0.0	23.6	25.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	195	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Overall, the bank's HMDA lending in the low-income tract is consistent with demographics and aggregate lenders' performance. In 2019, the bank made only one HMDA loan (0.3%), a home purchase loan, in the low-income tract. Similarly, aggregate lenders reported only 0.3% of loans in that tract. The bank did not make HMDA loans in the low-income tract in 2020, which is also generally consistent with aggregate lenders' activity (0.3%). According to 2020 FFIEC adjusted census data, only 8.5% of the housing units in the low-income tract are owner-occupied; most housing units, 81.5%, are rental units and 10.0% are vacant units in the low-income census tract. The low-income census tract is comprised of a portion of the AFB. This information explains the limited lending in this tract.

In 2019 and 2020, the bank extended 3.8% and 4.1%, respectively, of its HMDA lending in the moderate-income tracts. The bank's lending in the moderate-income tracts is below aggregate lenders and demographics. According to 2020 FFIEC adjusted census data, 47.4% of housing units are rentals and 8.0% are vacant in the moderate-income tracts. Over 2019 and 2020, the bank made loans in each of the moderate-income census tracts in the AA, as well as the other tracts, except for a middle-income tract that is comprised of a portion of the AFB and 100.0% rental units. As previously mentioned, there is strong competition for HMDA loans throughout the AA. Overall, the bank's lending in the low- and moderate-income tracts is reasonable given demographics and the competitive banking environment.

Lastly, the bank's 2018 HMDA lending performance in LMI census tracts was generally consistent with its 2019 and 2020 HMDA lending performance.

Consumer. The geographic distribution of consumer loans is adequate. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

Adjusted FFIEC census data for 2019 and 2020 indicates that 0.4% of households reside in the low-income tract and 14.9% of households reside in the moderate-income tracts of the AA. In 2019 and 2020, the bank's overall lending in the low-income tract was 0.1% and 0.2%, respectively, which is comparable to demographics. By product level, the bank's lending in this tract is also comparable to demographics. The bank originated only three loans in the low-income census tract during 2019 and 2020. As previously mentioned, this tract includes the AFB, which explains the small percentage of households in the tract. In addition, households in the low-income tract have easy access to a credit union (which strongly competes for consumer loans). In 2019 and 2020, the bank's overall lending in the moderate-income tracts was 6.5% and 6.2%, respectively, which is below demographics. Although the bank's lending in moderate-income tracts is below demographics, it is reasonable. Competition from other financial institutions for consumer loans is strong in the AA. The bank made consumer loans to borrowers in each of the census tracts in the AA, including all the low- and moderate-income census tracts, over 2019 and 2020.

The bank's 2018 consumer lending performance in LMI tracts was generally consistent with the 2019 and 2020 consumer lending performance.

Small Business. The geographic distribution of small business loans is good. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Rapid City-Spearfish, SD CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	0.4
Moderate	52	10.7	13.5	6,777	16.8	16.2	142	13.0	13.9	16,855	19.3	16.0	17.5
Middle	329	67.8	60.5	23,908	59.2	58.8	716	65.3	62.5	52,415	60.2	61.1	61.6
Upper	104	21.4	22.2	9,713	24.0	22.9	238	21.7	21.2	17,870	20.5	21.5	20.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.3	0	0.0	1.7	0	0.0	2.0	0	0.0	1.2	
Total	485	100.0	100.0	40,398	100.0	100.0	1,096	100.0	100.0	87,140	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's small business lending in the low- and moderate-income census tracts was generally consistent with aggregate lenders in 2019 and 2020. However, the bank did not originate small business loans in the low-income census tract for this evaluation period. According to D&B data, only 0.4% of businesses in 2019 and 2020 were located in the low-income tract. As previously mentioned, the low-income tract is made up of a portion of the AFB and has a small number (34) of businesses operating in that tract. The bank's lack of lending in the low-income census tract is reasonable given this performance context.

The bank made 10.7% and 13.0% of its small business loans in moderate-income tracts in 2019 and 2020, respectively. According to D&B data, only 17.5% of businesses in 2019 and 2020 were located in the

moderate-income tracts. The bank's lending in the moderate-income census tracts was comparable to aggregate lenders, who made 13.5% and 13.9% of loans in these tracts in 2019 and 2020, respectively. As previously mentioned, the bank has strong competition in the AA. The bank made small business loans to borrowers in each of the census tracts in the AA, except the low-income tract as noted above and one middle-income tract. The middle-income tract with no loans is comprised of a portion of the AFB, which explains the lack of small business loan demand.

The bank's 2018 small business lending performance in LMI census tracts was generally consistent with the 2019 and 2020 performance.

Community Development Loans

The bank makes an adequate level of community development loans in this AA. During the evaluation period, the bank refinanced two loans totaling approximately $1.4 million that helped finance affordable multifamily housing for LMI individuals. As mentioned, affordable housing continues to be a major concern. These loans are responsive to the community needs. The bank's community development lending is reasonable given competition in the AA.

INVESTMENT TEST

The bank has a significant level of qualified investments, including donations, in the Rapid City-Spearfish, SD CSA AA. The bank did not make any non-donation investments in this AA during the evaluation period, which is adequate given the competition for such opportunities. The bank continues to hold one prior-period qualified investment, a bond totaling $700,000, that benefited this AA. The bond helped revitalize and stabilize a moderate-income area in Rapid City by funding improvements to the wastewater collection and treatment facility.

The bank made a significant level of qualified investments in the form of donations as shown in the table at right. Of the $116,918 in donations during the evaluation period, nearly all donations benefited organizations that provide community services to LMI individuals. The funds helped local organizations provide food, clothing, shelter, and education to address community needs. In 2020, the bank donated approximately $18,000 to an organization that helped address food insecurity during the pandemic. Other donations during the evaluation period also helped address food insecurity. In addition, the bank made an impactful donation during 2020 that enabled the organization to purchase essential personal items for low-income students. The bank's donations are responsive to the needs in the AA.

Qualified Investment Donations in the Rapid City-Spearfish CSA AA

Purpose	#	$
Community Service	87	$116,758
Economic Development	1	$160
Total	**88**	**$116,918**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA. Hours and services do not vary in a way that inconveniences particular individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the Rapid City-Spearfish CSA AA are readily accessible to the bank's geographies and to individuals of different incomes. During the evaluation period, the bank operated 10 full-service offices in the Rapid City-Spearfish CSA AA. Two branches are in Rapid City in moderate-income census tracts. The other four moderate-income census tracts are located within a mile of a Rapid City branch. The low-income tract is approximately five miles away from the nearest branch. The bank also operated a branch in each of the following communities: Deadwood, Hill City, Lead, New Underwood, Sturgis, and Wall, as well as two branches in Spearfish. Each branch has an ATM, and most branches have drive-up facilities, as well as extended and weekend hours. The bank also operates stand-alone ATMs in the AA. As mentioned previously, four branches moved into this AA, and one branch and one drive-up facility moved out of this AA as a result of the bank's changed AA delineations.

The following table shows the geographic distribution of branches and drive-up facilities in this AA.

Geographic Distribution of Branches
Assessment Area: Rapid City-Spearfish, SD CSA

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			1	3.0%	0.4%	0.4%
	LS	0		0	0							
Moderate	**Total**	**2**	**20.0%**	**0**	**0**	**2**	**2**	**2**				
	DTO	0		0	0	0			6	18.2%	14.9%	16.9%
	LS	0		0	0							
Middle	**Total**	**5**	**50.0%**	**0**	**0**	**4**	**3**	**3**				
	DTO	0		0	0	0			20	60.6%	63.3%	62.6%
	LS	0		0	0							
Upper	**Total**	**3**	**30.0%**	**0**	**0**	**3**	**2**	**3**				
	DTO	0		0	0	0			6	18.2%	21.4%	20.2%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**10**	**100.0%**	**0**	**0**	**9**	**7**	**8**				
	DTO	0		0	0	0			33	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Additional delivery services include telephone, online, and mobile banking, as well as remote deposit capture.

Community Development Services

The bank provides a relatively high level of community development services in the AA. The table provided to the right shows the community development services by purpose. During the evaluation period, 23 employees provided 38 services at 15 organizations. Bank employees primarily used their financial expertise to support organizations that provide essential services, health care, food, and financial education to LMI individuals. For example, bank employees served as board members and financial literacy instructors for the various organizations. Children and elderly individuals benefited from the financial education. The board positions provided leadership to organizations providing the previously mentioned essential services, as well as organizations supporting economic development and affordable housing. The bank's community development services are responsive to community needs.

Community Development Services in the Rapid City-Spearfish CSA AA	
Purpose	#
Community Services	31
Affordable Housing	4
Economic Development	3
Total	**38**

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BELLE FOURCHE, SOUTH DAKOTA ASSESSMENT AREA

The bank operates one full-service branch in this AA that includes the entirety of Butte County, in the western portion of the state. The AA is contiguous with and north of the Rapid City – Spearfish CSA. In 2018, the AA consisted of Butte and Lawrence counties. The OMB designated Lawrence County as part of the Spearfish, SD Micropolitan Area, which together with the Rapid City MSA is the Rapid City-Spearfish, SD CSA. As such, the bank delineated the Belle Fourche AA as Butte County. At that time, Lawrence County, which includes the towns of Lead, Spearfish, and Deadwood, became part of the Rapid City-Spearfish CSA AA.[32] The bank did not open or close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BELLE FOURCHE ASSESSMENT AREA

Examiners determined the bank's lending[33] test performance in this AA is generally consistent with the overall state rating. The bank's service and investment test performance in this AA is below the performance in the full-scope nonmetropolitan AA. The bank's investment test performance conclusion in this AA is based on very limited donations and no new non-donation investments. The bank's service test performance conclusion in this AA is primarily based on limited community development services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CUSTER-HOT SPRINGS, SOUTH DAKOTA ASSESSMENT AREA

This AA consists of Custer and Fall River counties, which are in the southwestern corner of South Dakota. The AA is contiguous with and south of the Rapid City – Spearfish CSA. In 2018, this AA consisted of Fall River County. For 2019 and 2020, the bank delineated this AA to include Fall River and Custer counties after the OMB removed Custer County from the Rapid City MSA in 2018.

In this AA, the bank operates full-service branches in Custer, Edgemont, and Hot Springs. The Custer office as well as the Custer drive-thru facility became part of this AA during the evaluation period given the AA delineation changes that took effect in 2019. The bank closed the drive-thru facility in Custer in 2019.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CUSTER-HOT SPRINGS ASSESSMENT AREA

Examiners determined the bank's lending and service performance in this AA is generally consistent with the overall state rating. This performance does not change the conclusion for the state. The bank's investment test performance in this AA is below the performance in the state. The bank's investment test

[32] The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data; it also reflects changes from the OMB revised MSA delineations.
[33] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

performance conclusion in this AA is based on very limited donations and no new non-donation investments.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF SOUTH DAKOTA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The South Dakota state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AAs, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan South Dakota AAs			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Belle Fourche	Consistent	Below	Consistent
Custer-Hot Springs	Consistent	Below	Below

OREGON

CRA RATING FOR Oregon: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Outstanding

Major factors supporting the rating include the following:

- The bank's lending activity in the Oregon AAs shows good responsiveness to local credit needs.
- Overall, the lending to businesses of different sizes and to LMI borrowers is good.
- Overall, the geographic distribution of loans throughout the AAs is good.
- The bank is a leader in making community development loans.
- Overall, the bank uses flexible loan programs (notably PPP lending) in its Oregon branches.
- Overall, qualified investments are significant. The bank has an adequate level of qualified investments in the form of securities and an excellent level of donations, demonstrating overall good responsiveness to community development needs.
- Bank retail services are generally readily accessible to businesses and residents throughout the AAs. Overall, the bank is a leader in providing community development services in its Oregon AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Oregon is generally consistent with the scope for the overall institution, as described earlier in the Institution section. Examiners completed a full-scope review for the Bend-Prineville, OR CSA and the Medford-Grants Pass, OR CSA AAs. Examiners weighted the Bend-Prineville CSA AA greater than the Medford-Grants Pass CSA AA based on the bank's lending volume in those AAs.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the following AAs in Oregon: Portland-Vancouver-Salem, OR-WA CSA; Eugene-Springfield, OR MSA, Seaside, Klamath Falls-Roseburg, Hood River, Madras, Newport-Lincoln City, and The Dalles. Examiners evaluated whether the bank's performance in the limited-scope AAs was consistent with its performance in the full-scope AAs. The limited-scope MSA AAs are compared against metropolitan full-scope AAs. Similarly, nonmetropolitan limited-scope AAs are compared with the state performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OREGON

Assessment Area Information. The bank had 10 AAs in Oregon during the evaluation period. All of these AAs are new since the previous evaluation because of bank acquisitions in 2017 and 2018.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks 11th among the 43 FDIC-insured institutions in Oregon, with 2.3% of the state's deposits. The bank has $2.3 billion in deposits in its Oregon AAs, which represent 17.4% of the bank's total deposits. Three large national banks each have over 10.0% deposit market share, with the leader possessing 20.3% of deposit market

share. The bank operates in a highly competitive environment, and all of the bank's Oregon AAs have large national and regional banks.

Based on 2020 FFIEC adjusted census data, the Oregon AAs include 806 census tracts: 18 low-, 171 moderate-, 402 middle-, 207 upper-, and eight unknown-income tracts.[34] Five of the unknown-income tracts are tracts delineated to cover large bodies of water (9900 series). Specifically, these tracts are in the bank's Oregon AAs along the Pacific coast: Seaside, Newport-Lincoln City, Eugene-Springfield, and Klamath Falls-Roseburg. Each of these AAs has one unknown-income tract, designated as a water tract, except for the bank's Klamath Falls-Roseburg AA, which includes two such tracts. The remaining three unknown-income tracts are in the bank's Portland-Vancouver-Salem, OR-WA CSA AA. Specifically, one of these tracts is in Clackamas County, and is located in Mount Hood National Forest; Mount Hood, the highest mountain in the state, is in this forest. Another unknown-income tract in the Portland-Vancouver-Salem, OR-WA CSA AA has no population, is in an industrial area, and is near a university. The third unknown-income tract in this AA is in downtown Portland, has low population, and is near another university. As of 2020, 11 census tracts in nonmetropolitan areas are classified as distressed. In 2019 and 2018, respectively, 15 and zero tracts in nonmetropolitan areas were classified as distressed.

Many of the Oregon AAs include American Indian reservations. The Warm Springs Reservation is located in north-central Oregon, primarily in Wasco County (The Dalles AA) and Jefferson County (Madras AA), with small portions extending into Clackamas and Marion counties (part of the Portland-Vancouver-Salem OR-WA, CSA AA). Small sections of land are also in the northeast corners of Hood River County (Hood River AA) and Wasco County. Small sections of the Grande Ronde Reservation are located in northwestern Polk County (part of the Portland-Vancouver-Salem OR-WA, CSA AA). Small portions of trust land for the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians are near the coast in Lane County (Eugene-Springfield MSA AA) and Coos County (part of the Klamath Falls-Roseburg AA). The Klamath Indian Reservation includes small parcels of land in the southern half of Klamath County (part of the Klamath Falls-Roseburg AA). The Cow Creek Band of Umpqua Tribe of Indians owns land parcels in the southern half of Douglas County (part of the Klamath Falls-Roseburg AA). The Coquille Indian Reservation includes small parcels of trust land in the southern half of Coos County and small land parcels along the coast near Coos Bay. The Siletz Reservation is in east-central Lincoln County (Newport-Lincoln City AA) and includes a number of small land parcels. Finally, Celilo Village, Oregon, is an unincorporated American Indian community along the Columbia River in northeastern Wasco County, and the land is held in trust.

Population. According to 2020 FFIEC adjusted census data, the total population of the AAs in Oregon is 3,785,477, which represents 96.1% of the state's population (3,939,233).[35] The data also shows that 78.1% of families reside in middle- and upper-income census tracts and that 14.1% of households are below the poverty level.

General Economic and Housing Information. Economic conditions in the Oregon AAs varied by region but all experienced the effects of the pandemic. Overall, the economies in many of the bank's AAs have been strong and resilient despite the pandemic and a devastating wildfire. Bank management indicated that access to PPP funds and enhanced unemployment benefits assisted in keeping local economies vibrant. However, staffing shortages persist and competition for skilled workers is an ongoing challenge

[34] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

[35] The population of the AAs in Oregon includes the population of Clark County, in the state of Washington, which is part of the Portland-Vancouver-Salem, OR-WA CSA AA.

for many employers. Major industries can vary between coastal markets and inland communities, with the latter having a broader mix of industries. Overall, major employers include healthcare providers, school districts, local government, technology firms, universities, and tribal government, as well as manufacturing (including aviation and aerospace), outdoor recreation, footwear, and specialty food and beverage companies, among others. Tourism is also an important industry, and it felt the greatest impact from the pandemic according to bank management. Lumber and wood products, agriculture, commercial fishing, and shipbuilding and repairs are major industries in certain areas. Significant portions of certain bank AAs are heavily forested and managed by the U.S. Department of Agriculture Forest Service. The population is increasing as Oregon is a desirable state to live in for many reasons including abundant year-round recreational opportunities. For the same reason, bank management indicated that Oregon is a desirable location for visitors as well. Homelessness and food insecurity are also significant and increasing concerns in Oregon. The annual average statewide unemployment rate for Oregon was 4.0% in 2018, 3.7% in 2019, and 7.6% in 2020; these figures were consistent with the national annual unemployment rate of 3.9% in 2018 and 3.7% in 2019, and slightly below the rate of 8.1% in 2020.

The housing market in Oregon varies by region; however, significant affordable housing concerns are present in several of the bank's AAs, including some coastal communities. Bank management indicated that the pandemic and devastating wildfires have exacerbated affordable housing issues. Home and rental prices have been rapidly increasing.

According to 2020 FFIEC adjusted census data, 55.9% of the housing in the Oregon AAs was owner-occupied, 35.7% was rental, and 8.4% was vacant. The median housing value was $244,197 for Oregon AAs; the lowest was $149,100 in Jefferson County and the highest was $321,300 in Hood River County. The median age of housing stock in the Oregon AAs was 43 years; it was the lowest in Deschutes County at 22 years and the highest at 50 years in Multnomah County.

Numerous financial institutions are in Oregon. Many large national and regional banks, as well as credit unions, operate throughout the state. Accordingly, competition for deposits, loans, and community development activities is strong in the bank's AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

Examiners based the bank's Oregon evaluation on full-scope reviews of the Bend-Prineville, OR CSA and the Medford-Grants Pass, OR CSA AAs and limited-scope reviews of the remaining Oregon AAs. A detailed discussion of the bank's performance in the full-scope AAs and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Oregon is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests. The ratings below primarily reflect the bank's performance in the full-scope AAs.

The Lending Test rating is high satisfactory. The bank's lending activity reflects good responsiveness overall to credit needs throughout the Oregon AAs. Overall, the distribution of HMDA, small business, and consumer loans by income and revenue size of borrowers is good. The overall geographic distribution of loans is good. The bank is a leader in providing community development loans. Overall, the bank uses flexible loan programs (notably PPP loans) in all Oregon AAs to help meet credit needs.

The Investment Test rating is high satisfactory. Overall, qualified investments, including donations, are significant. The bank has an adequate level of qualified investments in the form of securities and an

excellent level of donations, demonstrating overall good responsiveness to community development needs.

The Service Test rating is outstanding. In general, delivery systems are readily accessible throughout the bank's Oregon AAs. The bank's business hours and services do not vary in a way that inconveniences certain individuals or areas. The bank is a leader in providing community development services.

LENDING TEST

The Lending Test rating is high satisfactory for Oregon.

Lending Activity

The bank's lending levels reflect good responsiveness to credit needs in its Oregon AAs. The table below shows the bank's lending in its Oregon AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the Oregon Assessment Areas

Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	2,436	26.8%	678,153	58.7%
Small Business-reportable	4,100	45.0%	419,279	36.3%
Small Farm-reportable	63	0.7%	7,406	0.7%
Consumer-optional reportable	2,503	27.5%	49,782	4.3%
Total Loans	9,102	100.0%	1,154,620	100.0%

The Oregon AAs account for 11.8% by number and 14.6% by amount of the bank's lending activity during the evaluation period. Small business lending activity significantly increased from 2019 to 2020 due to the bank's PPP lending. In addition, HMDA lending also increased significantly from 2019 to 2020 due to the refinance boom, according to bank management.

The bank was typically not among the leading lenders for small business, small farm, and HMDA loans, with some exceptions involving small business lending in 2020 due to PPP lending and small farm lending. For example, the bank was among the top five small farm lenders in the Hood River AA each year.

The bank uses flexible and/or innovative lending programs, notably PPP loans, for businesses. Refer to the Innovative and Flexible Lending Practices in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the Oregon AAs. In addition, the geographic distribution and dispersion of loans is good overall and does not reveal any unexplained gaps or patterns.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Bend-Prineville CSA and Medford-Grants Pass CSA AAs. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.
During the evaluation period, the bank made loans through flexible loan programs totaling over $231.2 million in its Oregon AAs (including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

Community Development Loans

Oregon Community Development Loans		
Purpose	**#**	***$***
Affordable Housing	36	40,658,656
Community Services	4	5,201,080
Economic Development	1	2,729,248
Revitalize or Stabilize	6	20,370,000
Total	**47**	68,958,984

The bank is a leader in making community development loans in the Oregon AAs. This conclusion primarily reflects the bank's performance in the full-scope AAs but also reflects the bank's community development lending in the Portland-Vancouver-Salem CSA AA as described below. As shown in the table at the right, the bank made 47 community development loans totaling nearly $69.0 million that benefited the Oregon AAs or statewide Oregon. The bank made community development loans in most Oregon AAs. The AAs without community development loans (Hood River, Klamath Falls-Roseburg, Newport-Lincoln City, and Seaside) have relatively limited lending activity and deposit market share.

Most community development loan dollars (59.0%) supported affordable housing efforts and the bank shows excellent responsiveness to serious affordable housing concerns. The bank made loans to nonprofit housing organizations, housing authorities, and participated in consortium lending involving a CDFI focused on affordable housing throughout the state. A few of the bank's loans also either involve a complex LIHTC project or were made to an organization that helps develop LIHTC projects.

The bank's community development loan dollars were concentrated in the Portland-Vancouver-Salem CSA AA (50.3%) and the Bend-Prineville CSA AA (24.0%). More than half of the bank's community development loan dollars were originated in AAs that were not included in examiners' full-scope reviews; the bank's community development lending here is notable.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Oregon. The bank has an overall significant level of qualified investments, including donations, demonstrating good responsiveness to credit and community development needs.

During the evaluation period, the bank made an overall adequate level of non-donation investments. While the bank did not make non-donation investments in the two AAs receiving full-scope reviews (Bend-Prineville CSA and Medford-Grants Pass CSA AAs), bank management indicated that competition for qualified investments in the form of bonds or LIHTCs, for example, is strong, particularly with much larger financial institutions, and that these opportunities are also limited.

The bank purchased two new MBS totaling nearly $3.8 million involving LIHTC projects, which are located in moderate-income tracts, that benefit the bank's Portland-Vancouver-Salem CSA AA. In

addition, as part of a 2017 bank merger, the bank acquired two equity equivalent investments in a CDFI with a statewide affordable housing focus, totaling $200,000. Overall, the bank has a smaller market presence in many of its Oregon AAs based on deposit market share.

Donations. The bank made an excellent level of donations during the evaluation period. Most donations ($466,067) directly benefited the bank's AAs and $167,559 benefited regional/statewide areas that include the bank's AAs. The following table shows the distribution of donations by AA, as well as at the regional/statewide level.

Oregon Qualified Investment Donations		
Assessment Area/Region	**Total**	
	#	**$**
Bend-Prineville CSA	149	142,800
Eugene-Springfield MSA	7	15,600
Hood River	3	2,820
Klamath Falls-Roseburg	25	48,983
Madras	3	5,600
Medford-Grants Pass CSA	98	121,129
Newport-Lincoln City	4	8,060
Portland-Vancouver-Salem CSA	67	113,855
Seaside	1	300
The Dalles	6	6,920
Regional Oregon	66	148,499
State of Oregon	7	19,060
Total	436	633,626

By individual area and dollar, most donations benefited regional areas in Oregon, although the bank made a similar dollar volume of donations in the Bend-Prineville CSA AA. Many nonprofits that the bank provides grants to in Oregon serve a regional area that includes more than one bank AA. The bank made donations in all of its Oregon AAs. Overall, most donations were to organizations that provide essential services to LMI individuals. The bank supported organizations that provide food as well as services for at-risk youth and the homeless, for example. The bank made a number of donations that helped address needs during the pandemic, including food insecurity and health programs. The bank also made donations that helped to revitalize or stabilize designated disaster areas and a moderate-income area, promote affordable housing, and support economic development efforts. The bank made $47,500 in donations that helped with wildfire recovery efforts in certain parts of Oregon; most of this amount went to an organization that provided wildfire rebuilding throughout a regional area that included five bank AAs (Eugene-Springfield MSA, Klamath Falls-Roseburg, Medford-Grants Pass CSA, Newport-Lincoln City, and Portland-Vancouver-Salem CSA AAs). The bank's donations that addressed food insecurity and health needs during the pandemic, affordable housing, and devastating wildfires are particularly noteworthy. Overall, the bank's donations show excellent responsiveness to identified community needs.

SERVICE TEST

The Service Test rating is outstanding for Oregon. Delivery systems are generally readily accessible throughout the Oregon AAs. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that

inconveniences certain people or areas. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Finally, the bank is a leader in providing community development services in the Oregon AAs.

Retail Banking Services

Generally, the bank's delivery systems are readily accessible to residents and business throughout the bank's Oregon AAs. The bank operates 31 branches (most of which operate a drive-up facility and have an ATM), two LPOs, one stand-alone drive-up office (which is an additional branch), and two stand-alone ATMs in the state. The bank operates a total of 35 ATMs in Oregon. Several offices offer weekend hours, and most offices offer extended hours. The bank's Oregon AAs are new since the previous evaluation due to bank mergers. The following table shows the bank's distribution of offices and drive-up facilities as of 2020.

Geographic Distribution of Branches
State of Oregon

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**1**	**3.1%**	**0**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			18	2.2%	1.9%	2.5%
	LS	0		0	0							
Moderate	**Total**	**12**	**37.5%**	**0**	**0**	**11**	**12**	**3**				
	DTO	0		0	0	0			171	21.2%	21.6%	20.6%
	LS	0		0	0							
Middle	**Total**	**13**	**40.6%**	**4**	**0**	**11**	**13**	**0**				
	DTO	1		1	0	1			402	49.9%	50.6%	46.0%
	LS	0		0	0							
Upper	**Total**	**5**	**15.6%**	**1**	**0**	**3**	**4**	**2**				
	DTO	0		0	0	0			207	25.7%	25.8%	29.5%
	LS	0		0	0							
Unknown	**Total**	**1**	**3.1%**	**0**	**0**	**0**	**1**	**0**				
	DTO	0		0	0	0			8	1.0%	0.1%	1.3%
	LS	0		0	0							
Totals	**Total**	**32**	**100.0%**	**5**	**0**	**26**	**31**	**5**				
	DTO	1		1	0	1			806	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, the bank has 3.1% and 37.5% of its branches in low- and moderate-income census tracts, respectively. In addition, both of the bank's LPOs are in moderate-income tracts, and 2.9% and 38.2% of the bank's ATMs are in low- and moderate-income tracts, respectively. The percentage of the bank's branches and ATMs in low-income tracts is consistent with demographics, as 2.2% of the tracts in the Oregon AAs are low-income tracts. The percentage of the bank's branches and ATMs in moderate-income tracts compares well to demographics, as 21.2% of the tracts in the Oregon AAs are moderate-income tracts.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank is a leader in providing community development services in the Oregon AAs. By AA, most services benefited the Bend-Prineville CSA AA, which is reasonable and is where the majority of the bank's lending activity occurs. The bank engaged in community development services in all of its Oregon AAs, including the much smaller markets. The table below shows the distribution of community development services by type of activity and AA.

Oregon Community Development Services					
Assessment Area/Region	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize or Stabilize***	***Total***
Bend-Prineville CSA	2	51	1	8	62
Eugene-Springfield MSA	0	2	0	0	2
Hood River	0	2	0	0	2
Klamath Falls-Roseburg	2	3	0	0	5
Madras	0	3	0	0	3
Medford-Grants Pass CSA	1	26	0	1	28
Newport-Lincoln City	0	2	0	0	2
Portland-Vancouver-Salem CSA	0	12	0	0	12
Seaside	0	1	0	0	1
The Dalles	0	2	0	0	2
Regional Oregon	0	2	5	1	8
State of Oregon	1	2	0	0	3
Totals	**6**	**108**	**6**	**10**	**130**

Numerous employees provided their financial expertise and time to organizations that support community development initiatives in Oregon, and many employees provided more than one community development service. The bank's services are focused on organizations that provide essential goods and

services to LMI individuals, including youth and seniors, such as financial literacy and food. Further, the bank provided a number of services to an organization that addresses homelessness, which is an increasing concern in some of the bank's Oregon AAs. Bank employees also provided services that helped to revitalize or stabilize moderate-income tracts or tracts classified as distressed, as well as to promote affordable housing and economic development. Affordable housing is a significant concern in some of the bank's Oregon AAs. Employees often held leadership positions within these organizations, including serving on the board of directors or on a committee, in addition to the numerous financial literacy training roles. Overall, the bank's services are highly responsive to the community development needs of the areas the bank serves. Based on 2020 FFIEC adjusted census data, 23.8% and 16.2% of households in the Oregon AAs are low- and moderate-income, respectively; 14.1% are below poverty level.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BEND-PRINEVILLE, OREGON CSA

Bank Information. The bank operates nine full-service branches, all with drive-up facilities, full-service ATMs, and extended hours.[36] Two branches offer weekend hours. The bank also operates an LPO and one stand-alone, cash-dispensing-only ATM in this AA. Six branches and the LPO operate in Bend, Oregon, and the bank also operates one branch in each of the following Oregon cities: Prineville, Redmond, and Sisters. By number, the bank has 6.3% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked first among nine FDIC-insured institutions operating in the Bend-Prineville, OR CSA, with a 22.9% deposit market share and $1.1 billion in deposits. The deposits in this AA represent 8.5% of the bank's overall deposits. The bank competes with large national banks, regional banks, a community bank, and credit unions.

Assessment Area Information. The Bend-Prineville CSA AA is in central Oregon and includes Deschutes and Crook counties, which form the Bend-Prineville, OR CSA. Deschutes County is designated as the Bend, OR Metropolitan Statistical Area and Crook County is designated as the Prineville, OR Micropolitan Statistical Area. This AA is new since the previous examination and became effective with the BOTC merger in 2017. The AA's 28 census tracts include six moderate-, 17 middle-, and five upper-income tracts. The four middle-income census tracts that comprise Crook County are classified as distressed for 2019. The AA is adjacent to the bank's Klamath Falls-Roseburg AA, Eugene-Springfield MSA AA, and Madras AA, all within Oregon. Significant portions of the AA include forestland.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D&B data.[37]

Combined Demographics Report								
2020 Bend-Prineville, OR CSA AA								
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	10,807	21.5
Moderate	6	21.4	9,817	19.5	1,573	16.0	9,499	18.9
Middle	17	60.7	31,560	62.8	3,393	10.8	10,060	20.0
Upper	5	17.9	8,872	17.7	423	4.8	19,883	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0

[36] The Bend East Forum branch has two full-service ATMs.

[37] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

Combined Demographics Report								
2020 Bend-Prineville, OR CSA AA								
Total AA	**28**	**100.0**	**50,249**	**100.0**	**5,389**	**10.7**	**50,249**	**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	20,549	8,192	16.7	39.9	8,962	43.6	3,395	16.5
Middle	57,328	31,607	64.3	55.1	14,001	24.4	11,720	20.4
Upper	14,190	9,353	19.0	65.9	3,301	23.3	1,536	10.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**92,067**	**49,152**	**100.0**	**53.4**	**26,264**	**28.5**	**16,651**	**18.1**

	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	4,565	30.0	4,245	29.6	293	38.5	27	24.8
Middle	7,266	47.7	6,935	48.3	282	37.0	49	45.0
Upper	3,392	22.3	3,172	22.1	187	24.5	33	30.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**15,223**	**100.0**	**14,352**	**100.0**	**762**	**100.0**	**109**	**100.0**
Percentage of Total Businesses:				**94.3**		**5.0**		**0.7**

	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	60	11.6	59	11.7	1	9.1	0	0.0
Middle	388	75.2	379	75.0	9	81.8	0	0.0
Upper	68	13.2	67	13.3	1	9.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**516**	**100.0**	**505**	**100.0**	**11**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.9**		**2.1**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Bend, OR MSA, for the year of loan origination. For residents residing in Crook County, this evaluation uses the FFIEC estimated median family income for the nonmetropolitan areas of Oregon for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Bend, OR MSA					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	**$69,600**	0 - $34,799	$34,800 - $55,679	$55,680 - $83,519	$83,520 - & above
2019	**$78,600**	0 - $39,299	$39,300 - $62,879	$62,880 - $94,319	$94,320 - & above
2020	**$76,600**	0 - $38,299	$38,300 - $61,279	$61,280 - $91,919	$91,920 - & above

Borrower Income Levels Statewide Non-Metropolitan – Oregon					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	**$54,700**	0 - $27,349	$27,350 - $43,759	$43,760 - $65,639	$65,640 - & above
2019	**$57,500**	0 - $28,749	$28,750 - $45,999	$46,000 - $68,999	$69,000 - & above
2020	**$61,400**	0 - $30,699	$30,700 - $49,119	$49,120 - $73,679	$73,680 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Bend, OR MSA, which was $62,013 for 2018, 2019, and 2020. For the nonmetropolitan areas of Oregon, this figure was $51,555 for 2018, 2019, and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 187,578. The largest age group of the AA is people who are 25 to 64 years of age, which comprises 53.3% of the AA's population. The remaining age groups are as follows: residents 17 years and younger (21.6%), residents 65 years and older (18.1%), and residents aged 18 to 24 years (7.0%). Bank management and a community contact indicated that the area has experienced significant population growth with people moving to the area for its abundant recreational opportunities. The contact also indicated that the coronavirus pandemic contributed to this growth as well given flexible, remote work. The population of Bend increased from 76,639 to 99,178 from the 2010 to the 2020 census, which is a 29.4% change.

Housing Information. According to 2020 FFIEC adjusted census data, this AA has 92,067 housing units: 53.4% are owner-occupied, 28.5% are rental units, and 18.1% are vacant. The median age of the housing

stock is 28 years, which is below the statewide median of 38 years. The median housing value is $242,967 and the affordability ratio is 20.3, which is similar to the state ratio of 21.5. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Community contacts and bank management indicated that affordable housing is a significant concern in the Bend area and that the pandemic exacerbated existing housing issues. Rapidly increasing home prices over the past several years, as well as the limited supply, has presented challenges for LMI individuals. The area's population growth has contributed to the significant housing appreciation. A contact indicated that the median home price in March 2020 in Bend was $460,000. People are moving from out of state and purchasing homes in cash. Bank management indicated that a significant percentage of houses in the area are vacation homes. Further, some area homes are no longer available for long-term rentals; rather, they are offered as short-term rentals through online rental companies for visitors, which reduces housing stock, according to a contact. Accessory dwelling units (ADU) have become more common in Bend and help address affordable housing issues. According to bank management, Redmond, Oregon, is more affordable and closer to Bend for commuting; however, home prices have also been increasing here, and the average home price is approximately $400,000. The average home price in Prineville is in the upper $200,000s and is around $900,000 in Sisters, Oregon.

The table below shows the housing cost burden in the AA (CSA), the MSA, and the state of Oregon for individuals of different income levels. As reflected in the table, individuals in both the low- and moderate-income brackets for both renter and homeowner categories exceed HUD's 30% cost-burden threshold, although the difference is greater for low-income individuals. The overall cost burden for renters and homeowners in the AA is similar to the state.

Bend-Prineville, OR CSA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Bend-Prineville, OR CSA	84%	63%	47%	68%	52%	27%
Crook County, OR	65%	47%	41%	64%	51%	27%
Deschutes County, OR (Bend, OR MSA)	87%	65%	48%	68%	53%	27%
NonMSA Oregon	74%	49%	42%	64%	38%	23%
Oregon	81%	57%	47%	70%	48%	25%
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						

General Economic and Business Information. According to community contacts and bank management, the economy is growing and diverse. Bend is a regional center of services for central Oregon and is known as an entrepreneurial community with many startups. The region is growing very quickly as it is a desirable location to live, offering year-round recreational activities such as fishing, hiking, rafting, skiing, snowboarding, and snowshoeing, as well as its overall quality of life, including highly rated schools. Major employers in Bend include healthcare providers, the school district, local government, outdoor recreation companies, technology/biotechnology firms, and the U.S. Department of Agriculture Forest Service. Growing industries include aviation and aerospace, specialty manufacturing, and brewing and distilling. Overall, companies rebounded well from the pandemic by the end of 2020, although service-based companies, such as retail shops, experienced more challenges than others. Outdoor work, such as construction and commercial development projects, experienced considerable activity due to the area's rapid growth. In general, many companies need more workers. No significant businesses left the

area or experienced layoffs in the past few years. Businesses generally weathered the pandemic well and PPP loans helped sustain operations for many businesses.

Economic drivers of smaller communities in the region vary. Bank management indicated that Redmond is known as the manufacturing hub of central Oregon, and it is also home to a growing regional airport. Sisters has a tourism-based economy with destination resorts and borders a national forest. Prineville has also experienced significant growth in data center development over the past 10 years. The economy is also dependent on cattle production, hay, and secondary wood products.

The annual average unemployment rate for the AA was generally consistent with that of the state. The following table provides the annual average unemployment rates for the AA (CSA), the MSA, and the state of Oregon. Bank management indicated that there was an increase in unemployment at the start of the pandemic but by year-end 2020, it had improved.

Annual Average Unemployment Rates			
Area	**2018**	**2019**	**2020**
Bend-Prineville, OR CSA	4.25%	3.98%	8.01%
Crook County, OR	5.78%	5.11%	8.82%
Deschutes County, OR (Bend, OR MSA)	4.09%	3.86%	7.92%
NonMSA Oregon	4.97%	4.65%	7.88%
Oregon	4.01%	3.70%	7.58%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BEND-PRINEVILLE OR CSA ASSESSMENT AREA

The bank's Lending Test performance in the Bend-Prineville CSA AA is good. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is also good. The bank is a leader in making community development loans. Overall, the bank uses flexible loan programs, notably PPP lending, to help meet credit needs. By product, examiners assigned the most and equal weight to small business and HMDA loans based on the total number and dollar volume of loans during the evaluation period, respectively, followed by consumer lending. Examiners did not include the bank's small farm lending in the analysis because agricultural loans are not a major product for this AA, based on volume.

The Investment Test performance in this AA is significant. The bank did not make any non-donation investments in the AA, which is adequate given performance context. Both the level and responsiveness of the bank's donations were excellent.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. Additionally, the bank is a leader in providing community development services.

LENDING TEST

The bank's Lending Test performance in the Bend-Prineville CSA AA is good.

Lending Activity

Overall, the bank's lending activity reflects good responsiveness to AA credit needs. For HMDA loans, the bank ranked seventh among 382 reporting HMDA loans in 2019 and ninth among 425 lenders in 2020. The bank's market share of HMDA lending averaged 3.2% for both years. For small business lending, the bank ranks eighth out of 81 lenders reporting CRA data in 2019 and eighth among 111 lenders in 2020. The bank's market share for small business loans was 3.8% in 2019 and higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented 5.9% by number and 8.7% by dollar amount of the bank's total lending. Within the Oregon AAs, the lending activity in the Bend-Prineville CSA AA was 50.4% by number and 59.7% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. At the product level, examiners evaluated home purchase, refinance, home improvement, and other purpose LOC loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Bend-Prineville, OR CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	2.4	3.0	663	0.9	1.5	1	0.5	2.2	220	0.2	1.1	21.5
Moderate	16	9.6	12.8	3,593	4.8	8.9	9	4.8	11.9	2,007	2.1	8.1	18.9
Middle	17	10.2	23.2	4,541	6.0	19.9	21	11.2	22.4	6,277	6.7	18.4	20.0
Upper	117	70.5	49.9	63,017	83.6	59.3	149	79.7	54.4	83,052	88.2	63.5	39.6
Unknown	12	7.2	11.0	3,532	4.7	10.4	7	3.7	9.2	2,627	2.8	8.8	0.0
Total	166	100.0	100.0	75,346	100.0	100.0	187	100.0	100.0	94,183	100.0	100.0	100.0
Refinance Loans													
Low	5	3.6	6.2	546	1.3	3.7	8	2.5	3.2	1,039	1.1	1.7	21.5
Moderate	11	7.9	14.1	1,669	3.8	9.9	39	12.3	12.8	7,682	7.8	9.3	18.9
Middle	32	23.0	23.0	8,337	19.2	20.2	47	14.9	22.3	12,883	13.1	19.9	20.0
Upper	83	59.7	39.8	30,382	69.9	48.7	191	60.4	45.9	68,170	69.3	52.8	39.6
Unknown	8	5.8	16.9	2,555	5.9	17.5	31	9.8	15.8	8,586	8.7	16.3	0.0
Total	139	100.0	100.0	43,489	100.0	100.0	316	100.0	100.0	98,360	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Bend-Prineville, OR CSA

Home Improvement Loans													
Low	3	5.3	5.2	88	1.2	3.3	4	5.3	2.6	350	3.8	1.9	21.5
Moderate	4	7.0	15.3	225	3.1	11.2	10	13.3	12.6	924	10.1	10.5	18.9
Middle	17	29.8	23.5	1,996	27.8	17.8	13	17.3	21.8	902	9.9	16.1	20.0
Upper	32	56.1	54.2	4,580	63.7	65.0	46	61.3	61.5	6,744	73.9	69.8	39.6
Unknown	1	1.8	1.8	300	4.2	2.6	2	2.7	1.5	200	2.2	1.8	0.0
Total	57	100.0	100.0	7,189	100.0	100.0	75	100.0	100.0	9,120	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	18	3.7	4.6	1,667	1.2	2.5	18	2.8	2.9	1,960	0.9	1.5	21.5
Moderate	37	7.7	13.4	5,942	4.2	9.3	65	10.0	12.4	11,297	5.3	8.8	18.9
Middle	85	17.6	22.9	16,433	11.6	19.8	91	14.0	22.1	20,820	9.7	19.0	20.0
Upper	293	60.8	46.0	109,389	77.5	55.0	434	66.6	49.5	167,822	78.6	57.4	39.6
Unknown	49	10.2	13.1	7,681	5.4	13.5	44	6.7	13.2	11,693	5.5	13.3	0.0
Total	482	100.0	100.0	141,112	100.0	100.0	652	100.0	100.0	213,592	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Bend-Prineville, OR CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	6	6.5	5.3	370	2.7	2.3	5	6.8	4.7	351	3.0	2.8	21.5
Moderate	6	6.5	12.1	455	3.3	5.6	7	9.6	8.4	684	5.9	3.9	18.9
Middle	19	20.4	21.9	1,559	11.3	14.3	10	13.7	20.1	758	6.5	12.7	20.0
Upper	61	65.6	57.5	11,410	82.4	74.5	47	64.4	62.9	9,556	82.2	75.4	39.6
Unknown	1	1.1	3.2	50	0.4	3.3	4	5.5	3.8	280	2.4	5.2	0.0
Total	93	100.0	100.0	13,844	100.0	100.0	73	100.0	100.0	11,629	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.1	0	0.0	3.1	0	0.0	4.9	0	0.0	1.7	21.5
Moderate	0	0.0	12.8	0	0.0	7.1	0	0.0	14.7	0	0.0	5.5	18.9
Middle	0	0.0	19.6	0	0.0	14.8	0	0.0	10.3	0	0.0	7.5	20.0
Upper	0	0.0	53.4	0	0.0	62.8	1	100.0	61.4	300	100.0	77.4	39.6
Unknown	0	0.0	6.1	0	0.0	12.3	0	0.0	8.7	0	0.0	7.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level Assessment Area: Bend-Prineville, OR CSA													
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.5
Moderate	0	0.0	0.0	27	2.2	0.0	0	0.0	0.0	0	0.0	0.0	18.9
Middle	0	0.0	1.2	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	20.0
Upper	0	0.0	3.7	0	0.0	4.2	0	0.0	0.0	0	0.0	0.0	39.6
Unknown	27	100.0	95.1	0	0.0	94.4	0	0.0	100.0	0	0.0	100.0	0.0
Total	27	100.0	100.0	1,244	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

In 2019 and 2020, the bank's overall lending to low-income borrowers was comparable to aggregate lenders. The bank's overall lending to moderate-income borrowers in 2019 was below aggregate lenders and in 2020 was consistent. The bank and aggregate lenders were both below demographics for overall lending to low- and moderate-income borrowers. Based on 2019 and 2020 FFIEC adjusted census data, 21.5% of the families in the AA are low income and 18.9% are moderate income.

The bank's market share of HMDA loans in the AA is small. Bank management indicated that the bank competes with many institutions for HMDA loans, including mortgage companies, large national banks, credit unions, and regional banks. In 2020, for example, the leading HMDA lender by far in the market was a mortgage company. Further, as discussed, community contacts and bank management noted the area's significant affordable housing concerns.

Given the context discussed above, the bank's performance in lending to low-income borrowers each year and to moderate-income borrowers in 2020 is good. For the products analyzed and for each year, the bank's lending to low-income borrowers is comparable to aggregate lending. In 2020, the bank's lending to moderate-income borrowers is generally comparable to aggregate lending, except for home purchase lending, where the bank's performance is below.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $76,600 for the Bend MSA, an individual with the highest income in the low-income bracket ($38,299) could afford a $114,897 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($61,279) could afford a $183,837 home. According to 2020 FFIEC adjusted census data, the median housing value in the Bend MSA is $253,433. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers. A community contact indicated that the pandemic exacerbated the area's high and increasing home prices and noted that the median housing price in March 2020 was approximately $460,000.

In this AA, the bank made use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in FannieMae HomeReady, FHA, and VA programs. During the evaluation period, the bank made loans through these programs totaling approximately $6.8 million. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

The bank's 2018 HMDA lending is generally consistent with its performance for 2019 and 2020.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by project, as well as by borrower and tract income, for 2019 and 2020.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Bend-Prineville OR CSA								
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	7	9.6%	91	5.7%
Moderate	14	19.2%	263	16.4%	14	19.2%	267	16.7%
Low/Moderate Total	14	19.2%	263	16.4%	21	28.8%	358	22.3%
Middle	52	71.2%	1,179	73.6%	21	28.8%	428	26.7%
Upper	7	9.6%	160	10.0%	31	42.5%	816	50.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	1,602	100.0%	73	100.0%	1,602	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	4.2%	9	1.7%
Moderate	2	8.3%	26	4.8%	4	16.7%	55	10.1%
Low/Moderate Total	2	8.3%	26	4.8%	5	20.8%	64	11.8%
Middle	17	70.8%	399	73.5%	6	25.0%	191	35.2%
Upper	5	20.8%	118	21.7%	11	45.8%	251	46.2%
Unknown	0	0.0%	0	0.0%	2	8.3%	37	6.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	24	100.0%	543	100.0%	24	100.0%	543	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	51	23.4%	391	11.2%
Moderate	40	18.3%	447	12.8%	44	20.2%	428	12.3%
Low/Moderate Total	40	18.3%	447	12.8%	95	43.6%	819	23.5%
Middle	151	69.3%	2,431	69.7%	49	22.5%	798	22.9%
Upper	27	12.4%	610	17.5%	68	31.2%	1,789	51.3%
Unknown	0	0.0%	0	0.0%	6	2.8%	82	2.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	218	100.0%	3,488	100.0%	218	100.0%	3,488	100.0%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Bend-Prineville OR CSA								
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	59	18.7%	491	8.7%
Moderate	56	17.8%	736	13.1%	62	19.7%	750	13.3%
Low/Moderate Total	56	17.8%	736	13.1%	121	38.4%	1,241	22.0%
Middle	220	69.8%	4,009	71.2%	76	24.1%	1,417	25.2%
Upper	39	12.4%	888	15.8%	110	34.9%	2,856	50.7%
Unknown	0	0.0%	0	0.0%	8	2.5%	119	2.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	315	100.0%	5,633	100.0%	315	100.0%	5,633	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Bend-Prineville OR CSA								
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	5.1%	19	1.9%
Moderate	4	10.3%	113	11.1%	9	23.1%	192	18.8%
Low/Moderate Total	4	10.3%	113	11.1%	11	28.2%	211	20.7%
Middle	32	82.1%	867	85.0%	7	17.9%	132	12.9%
Upper	3	7.7%	40	3.9%	21	53.8%	677	66.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	39	100.0%	1,020	100.0%	39	100.0%	1,020	100.0%
	Other – Secured							
Low	0	0.0%	0	0.0%	1	2.0%	65	3.6%
Moderate	7	13.7%	238	13.3%	12	23.5%	329	18.4%
Low/Moderate Total	7	13.7%	238	13.3%	13	25.5%	394	22.0%
Middle	32	62.7%	1,042	58.2%	10	19.6%	223	12.5%
Upper	12	23.5%	509	28.5%	27	52.9%	1,162	65.0%
Unknown	0	0.0%	0	0.0%	1	2.0%	10	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	51	100.0%	1,789	100.0%	51	100.0%	1,789	100.0%
	Other – Unsecured							
Low	0	0.0%	0	0.0%	29	13.9%	265	6.6%
Moderate	27	12.9%	368	9.2%	40	19.1%	564	14.1%
Low/Moderate Total	27	12.9%	368	9.2%	69	33.0%	829	20.8%
Middle	137	65.6%	2,557	64.1%	50	23.9%	908	22.8%
Upper	45	21.5%	1,064	26.7%	86	41.1%	2,196	55.1%
Unknown	0	0.0%	0	0.0%	4	1.9%	56	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	209	100.0%	3,989	100.0%	209	100.0%	3,989	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Bend-Prineville OR CSA								
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	32	10.7%	349	5.1%
Moderate	38	12.7%	719	10.6%	61	20.4%	1,085	16.0%
Low/Moderate Total	38	12.7%	719	10.6%	93	31.1%	1,434	21.1%
Middle	201	67.2%	4,466	65.7%	67	22.4%	1,263	18.6%
Upper	60	20.1%	1,613	23.7%	134	44.8%	4,035	59.4%
Unknown	0	0.0%	0	0.0%	5	1.7%	66	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	299	100.0%	6,798	100.0%	299	100.0%	6,798	100.0%

In 2019 and 2020, the bank's overall lending to low-income borrowers is below demographics. For the same period, the bank's overall lending to moderate-income borrowers is either consistent with or slightly exceeds demographics. According to 2019 and 2020 FFIEC adjusted census data, 23.8% of the households in the AA are low income and 17.2% are moderate income.

By product and for each year, the bank's lending to low-income borrowers is below demographics except for other unsecured lending in 2019, which was consistent with demographics. By product and for each year, the bank's lending to moderate-income borrowers is consistent with demographics except for motor vehicle and other secured lending in 2020, which exceeds demographics. In each year, the bank's highest level of lending to LMI borrowers was in other unsecured loans. Bank management indicated that the bank faces especially strong competition for consumer loans from credit unions and national banks.

The bank continues to offer small-dollar consumer loans. The bank originated 5.0% of all consumer loans in the AA for $3,000 or less. Of these small-dollar consumer loans, approximately 74.2% were to LMI borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the LMI borrowers in the AA.

Finally, the bank's 2018 consumer lending is generally consistent with its 2019 and 2020 consumer lending.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the small business loan data by revenue and loan size for 2019 and 2020. The table also includes information for aggregate lenders, for comparison purposes.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Bend-Prineville, OR CSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	120	46.3	51.0	9,335	27.7	36.2	358	24.8	47.3	23,394	18.5	30.8	94.3
Over $1 Million	136	52.5		23,746	70.4		183	12.7		34,390	27.3		5.0
Revenue Unknown	3	1.2		650	1.9		903	62.5		68,409	54.2		0.7
Total	259	100.0		33,731	100.0		1,444	100.0		126,193	100.0		100.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Bend-Prineville, OR CSA													
By Loan Size													
$100,000 or Less	175	67.6	94.2	6,033	17.9	40.1	1,107	76.7	89.2	35,427	28.1	36.0	
$100,001 - $250,000	47	18.1	2.8	8,752	25.9	13.7	226	15.7	6.0	37,555	29.8	18.6	
$250,001 - $1 Million	37	14.3	3.0	18,946	56.2	46.2	111	7.7	4.8	53,211	42.2	45.4	
Total	259	100.0	100.0	33,731	100.0	100.0	1,444	100.0	100.0	126,193	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	101	84.2		2,693	28.8		306	85.5		9,044	38.7		
$100,001 - $250,000	10	8.3		1,924	20.6		33	9.2		5,318	22.7		
$250,001 - $1 Million	9	7.5		4,718	50.5		19	5.3		9,032	38.6		
Total	120	100.0		9,335	100.0		358	100.0		23,394	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses was slightly below aggregate lenders in 2019 and was below aggregate lenders in 2020. According to 2019 and 2020 D&B data, 94.0% and 94.3% of businesses had gross annual revenues of $1 million or less, respectively. For both years, the bank and aggregate lenders were below demographic data. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less, as shown in the table. Over 2019 and 2020, the bank originated 75.3% of its small business loans for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with many financial institutions, including large national banks as well as credit card lenders in the AA.

The bank's lending to businesses with unknown revenue significantly increased from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of the applicants. In 2020, the bank made extensive use of this program; these loans were designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank originated over 1,100 PPP loans (with loan amounts of $1.0 million or less) for over $80.0 million in this AA, of which more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

The bank's 2018 small business lending is generally consistent with its 2019 small business lending performance.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's small business, HMDA, and consumer loans in the AA is good. The AA has no low-income and six moderate-income census tracts. Middle-income tracts are the highest by number and represent 60.7% of tracts in the AA. Three of the bank's branches (Bend 3rd and Revere, Bend Downtown, Bend East Forum) as well as the LPO are in moderate-income tracts. Further, three of the bank's branches in middle-income tracts and the one branch in an upper-income tract are all located very near moderate-income tracts. For both 2019 and 2020, the bank

typically made small business, consumer, and HMDA loans in each moderate-income tract in the AA. The bank's geographic distribution of loans does not reveal any unexplained gaps in lending.

Residential Real Estate. The geographic distribution of residential real estate loans is good. The tables below display the distribution of the bank's 2019 and 2020 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics. At the product level, examiners evaluated home purchase, refinance, home improvement, and other purpose LOC loans based on number volume.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Bend-Prineville, OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	21	12.7	18.2	7,783	10.3	15.6	19	10.2	16.0	8,430	9.0	14.1	16.7
Middle	100	60.2	64.7	36,940	49.0	60.9	105	56.1	66.3	49,420	52.5	61.9	64.3
Upper	45	27.1	17.2	30,623	40.6	23.5	63	33.7	17.7	36,333	38.6	24.0	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	166	100.0	100.0	75,346	100.0	100.0	187	100.0	100.0	94,183	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	14	10.1	16.5	2,468	5.7	13.5	34	10.8	14.3	8,337	8.5	12.5	16.7
Middle	87	62.6	65.9	28,400	65.3	63.7	183	57.9	64.6	50,948	51.8	62.1	64.3
Upper	38	27.3	17.6	12,621	29.0	22.8	99	31.3	20.9	39,075	39.7	25.4	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	139	100.0	100.0	43,489	100.0	100.0	316	100.0	100.0	98,360	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	22.8	15.5	884	12.3	12.8	9	12.0	14.4	709	7.8	11.1	16.7
Middle	27	47.4	62.2	2,895	40.3	58.5	41	54.7	59.8	4,141	45.4	56.2	64.3
Upper	17	29.8	22.3	3,410	47.4	28.7	25	33.3	25.8	4,270	46.8	32.7	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	7,189	100.0	100.0	75	100.0	100.0	9,120	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	42.9	0	0.0	42.0	1	100.0	38.1	1,037	100.0	12.8	46.9
Middle	3	100.0	57.1	11,420	100.0	58.0	0	0.0	47.6	0	0.0	65.7	41.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	21.4	11.3

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Bend-Prineville, OR CSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	11,420	100.0	100.0	1	100.0	100.0	1,037	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	70	14.4	17.2	13,010	8.5	15.0	73	11.2	14.8	19,794	9.2	13.0	16.7
Middle	290	59.8	64.8	88,350	57.9	61.9	370	56.7	64.8	110,253	51.4	61.7	64.3
Upper	125	25.8	18.0	51,172	33.5	23.1	210	32.2	20.3	84,582	39.4	25.2	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	485	100.0	100.0	152,532	100.0	100.0	653	100.0	100.0	214,629	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Bend-Prineville, OR CSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	14.0	15.7	1,670	12.1	11.3	10	13.7	11.4	1,281	11.0	9.7	16.7
Middle	59	63.4	58.5	7,885	57.0	52.9	40	54.8	58.2	5,444	46.8	53.9	64.3
Upper	21	22.6	25.7	4,289	31.0	35.8	23	31.5	30.4	4,904	42.2	36.4	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	93	100.0	100.0	13,844	100.0	100.0	73	100.0	100.0	11,629	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.2	0	0.0	10.2	0	0.0	13.6	0	0.0	17.1	16.7
Middle	0	0.0	68.9	0	0.0	58.8	1	100.0	60.9	300	100.0	41.7	64.3
Upper	0	0.0	16.9	0	0.0	31.0	0	0.0	25.5	0	0.0	41.2	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	33.3	22.0	205	16.5	8.8	0	0.0	20.6	0	0.0	13.5	16.7
Middle	14	51.9	62.2	810	65.1	73.9	0	0.0	65.4	0	0.0	55.6	64.3

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Bend-Prineville, OR CSA													
Upper	4	14.8	15.9	229	18.4	17.3	0	0.0	14.0	0	0.0	30.9	19.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	1,244	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

The bank made 14.4% of its HMDA loans in 2019 to borrowers residing in moderate-income tracts, which is comparable to aggregate lenders, who reported 17.2%, and to demographic data in the table. In 2020, the bank made 11.2% of its HMDA loans to borrowers residing in moderate-income tracts, which is slightly below aggregate lenders who reported 14.8% and below demographic data. According to 2019 and 2020 FFIEC adjusted census data, 19.5% of families reside in moderate-income tracts and 16.7% of owner-occupied units in the AA are located here. In both 2019 and 2020, the bank made HMDA loans in all moderate-income tracts in the AA, which is notable given the strong competition for HMDA loans in the AA and the bank's small HMDA market share.

The bank's 2018 HMDA lending in moderate-income tracts is generally consistent with its 2019 and 2020 performance.

Consumer. The geographic distribution of consumer loans is good. At the product level, examiners evaluated all loan types based on number volume. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

In 2019 and 2020, the bank's overall level of lending in the moderate-income tracts is below demographics, but reasonable given performance context. Adjusted FFIEC census data for 2019 and 2020 indicates that 22.8% of households reside in the moderate-income tracts of the AA. By product in 2019, the bank's performance is strongest for motor vehicle and other unsecured lending. By product in 2020, the bank's performance is consistent among all categories. In both 2019 and 2020, the bank made consumer loans in all moderate-income tracts, which is notable given the strong competition from credit unions and national banks in this AA.

The bank's 2018 consumer lending in moderate-income tracts is generally consistent with its 2019 and 2020 performance.

Small Business. The geographic distribution of small business loans is excellent. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract. The table also includes aggregate lending data for comparison.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Bend-Prineville, OR CSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	101	39.0	26.5	16,251	48.2	35.1	502	34.8	28.2	51,591	40.9	35.8	30.0
Middle	119	45.9	47.0	12,474	37.0	41.1	622	43.1	44.4	50,073	39.7	37.6	47.7
Upper	39	15.1	24.0	5,006	14.8	21.6	320	22.2	26.3	24,529	19.4	25.6	22.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.4	0	0.0	2.2	0	0.0	1.1	0	0.0	1.0	
Total	259	100.0	100.0	33,731	100.0	100.0	1,444	100.0	100.0	126,193	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank exceeded both aggregate lenders and demographics with its small business lending in the moderate-income tracts in 2019 and 2020, as shown in the table. As previously mentioned, most of the bank's branches and the LPO are in or very near moderate-income tracts. In 2019, the bank extended small business loans in all but one moderate-income tract (2.00), which is in the southwest corner of Deschutes County. The bank does not have a branch in this tract, and other financial institutions operate in the area (La Pine, Oregon). Bank management indicated that this moderate-income tract is in a rural, forested area with few businesses, which limits lending opportunities. In 2020, the bank extended numerous small business loans in each moderate-income tract. For each year, and of the bank's small business lending in moderate-income tracts, the majority of loans were made in the three adjacent moderate-income tracts in Bend, where three branches and the LPO are located.

The bank's small business lending in moderate-income tracts in 2018 was generally consistent with its performance in 2019 and 2020.

Community Development Loans

Community Development Loans Bend-Prineville CSA AA		
Purpose	**#**	***$***
Affordable Housing	7	13,407,900
Community Services	2	3,170,080
Total	**9**	16,577,980

The bank is a leader in making community development loans in the Bend-Prineville CSA AA. As shown in the table at the right, the bank made nine community development loans totaling nearly $16.6 million. The majority of the bank's community development loans, by number and dollar, promote affordable housing, which is an identified need according to bank management and community contacts. The bank's largest community development loan in the AA is for $8.3 million and involves a complex LIHTC project in Bend. The bank also made several community development loans to nonprofit affordable housing organizations. In addition, the bank made a large loan for $2.5 million to an organization that provides shelter and works to end homelessness in the area. A contact indicated that homelessness is increasing in the area. Finally, bank management indicated that

competition for community development loans among financial institutions is strong. Overall, the bank's community development loans show excellent responsiveness to community needs.

INVESTMENT TEST

Overall, the bank made a significant level of qualified investments, including donations, in the Bend-Prineville CSA AA. The bank did not make any non-donation investments in the AA, which is adequate given performance context. Bank management indicated that the bank faces strong competition for qualified investments in the form of bonds or LIHTCs, for example, and that these opportunities are also limited. Bank management noted that numerous financial institutions seek the same opportunities, such as when a school bond becomes available, and often large financial institutions have the competitive advantage for non-donation investments.

The bank made an excellent level of qualified investments in the form of donations as shown in the table at the right. Most of the bank's donations by number and dollar focused on community services targeted to LMI individuals. These donations helped local organizations provide essential goods and services to those in need, such as emergency shelter and food, as well as health and other services for LMI children and families. Bank management indicated that given the area's limited supply of affordable housing and significant service-based economy, residents can struggle when trying to pay rent and cover basic necessities such as food and transportation. Several of the bank's donations were made to address food insecurity and homelessness at the onset of the pandemic and are highly responsive to community needs. The bank also made a number of donations to local organizations that promote affordable housing in the area. Overall, the bank's donations show excellent responsiveness to identified needs.

Qualified Investment Donations in the Bend-Prineville CSA AA Assessment Area

Purpose	#	$
Affordable Housing	18	15,320
Community Service	131	127,480
Total	**149**	**142,800**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and services do not vary in a way that inconveniences particular individual or areas. The bank is a leader in providing community development services.

Retail Services

Delivery systems are readily accessible in the bank's AA. The bank's services and hours do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates nine full-service offices and one LPO in the AA. All branches have drive-up facilities, full-service ATMs, and extended hours; two branches offer weekend hours. The bank also operates one stand-alone, cash-dispensing-only ATM in this AA. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Three branches (Bend 3rd and Revere, Bend Downtown, Bend East Forum), the LPO, and the stand-alone ATM are located in moderate-income tracts. In addition, the bank's Bend South, Redmond, Sunriver, and Bend West branches, all located either in middle- or upper-income tracts, are very near (two miles or less) moderate-income tracts. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the geographic distribution of branches in this AA.

Geographic Distribution of Branches
Assessment Area: Bend-Prineville, OR CSA

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	**Total**	**3**	**33.3%**	**0**	**0**	**3**	**3**	**1**				
	DTO	0		0	0	0			6	21.4%	22.7%	29.4%
	LS	0		0	0							
Middle	**Total**	**5**	**55.6%**	**0**	**0**	**5**	**5**	**0**				
	DTO	0		0	0	0			17	60.7%	60.5%	48.6%
	LS	0		0	0							
Upper	**Total**	**1**	**11.1%**	**0**	**0**	**1**	**1**	**1**				
	DTO	0		0	0	0			5	17.9%	16.8%	22.0%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**9**	**100.0%**	**0**	**0**	**9**	**9**	**2**				
	DTO	0		0	0	0			28	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank is a leader in providing community development services in the AA. The table to the right shows the service activity and purpose category. Approximately 45 bank employees provided 62 community development services for approximately 15 organizations. The bank's community development services mainly focus on nonprofit organizations that provide essential services to LMI individuals (including youth), such as financial education, homeless services, and food. Notably, bank employees provided many community development services to an organization that works to end homelessness in the area, which a contact indicated is an increasing concern. Many bank employees also provided financial literacy training to LMI youth. Bank employees also provided services that helped to revitalize or stabilize moderate-income areas, promote affordable housing, and support economic development. During the evaluation period, bank employees served in various roles for the organizations, such as board member, committee member, and presenters. The bank's services address identified community needs, such as food insecurity and affordable housing.

Community Development Services in the Bend-Prineville CSA AA	
Purpose	**#**
Affordable Housing	2
Community Services	51
Economic Development	1
Revitalize or Stabilize	8
Total	**62**

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEDFORD-GRANTS PASS, OREGON CSA

Bank Information. The bank operates six full-service branches, most with drive-up facilities and deposit-taking ATMs, as well as a drive-thru only location with an ATM, for a total of seven offices, in the Medford-Grants Pass CSA AA. The bank also operates one stand-alone ATM in the AA. The full-service branches and the drive-thru location offer extended hours, and a few offices also offer weekend hours. Three full-service branches and the drive-thru location are located in Medford, two branches are in Grants Pass, and the remaining branch is in Ashland, Oregon. By number, the bank has 4.9% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked seventh among 13 FDIC-insured institutions operating in Jackson and Josephine counties, with a 7.1% deposit market share and $431.5 million in deposits. The deposits in this AA represent 3.2% of the bank's overall deposits. The bank competes with regional banks, large national banks, community banks, and credit unions.

Assessment Area Information. The Medford-Grants Pass CSA AA consists of Jackson and Josephine counties in southwestern Oregon, bordering northern California. Jackson County comprises the Medford, OR MSA and Josephine County comprises the Grants Pass, OR MSA. Together, they form the Medford-Grants Pass OR CSA. This AA is new since the previous examination and became effective with the BOTC merger in 2017. The AA's 57 census tracts include one low-, 10 moderate-, 33 middle-, and 13 upper-income census tracts. The AA is adjacent to the bank's Klamath Falls-Roseburg AA in Oregon. Significant portions of the AA are forestland.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D&B data.[38]

Combined Demographics Report 2020 Medford-Grants Pass, OR CSA AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.8	322	0.4	179	55.6	15,572	20.6
Moderate	10	17.5	10,309	13.7	2,229	21.6	13,997	18.5
Middle	33	57.9	45,617	60.4	6,163	13.5	14,804	19.6
Upper	13	22.8	19,216	25.5	1,764	9.2	31,091	41.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**57**	**100.0**	**75,464**	**100.0**	**10,335**	**13.7**	**75,464**	**100.0**

[38] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

Combined Demographics Report 2020 Medford-Grants Pass, OR CSA AA								
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	908	98	0.1	10.8	738	81.3	72	7.9
Moderate	20,046	7,901	10.6	39.4	10,034	50.1	2,111	10.5
Middle	77,179	45,720	61.2	59.2	24,726	32.0	6,733	8.7
Upper	31,677	20,946	28.1	66.1	7,851	24.8	2,880	9.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**129,810**	**74,665**	**100.0**	**57.5**	**43,349**	**33.4**	**11,796**	**9.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	777	4.2	707	4.0	63	6.8	7	5.0
Moderate	3,148	16.9	2,963	16.9	162	17.4	23	16.3
Middle	10,456	56.2	9,805	56.0	568	60.9	83	58.9
Upper	4,209	22.6	4,042	23.1	139	14.9	28	19.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18,590**	**100.0**	**17,517**	**100.0**	**932**	**100.0**	**141**	**100.0**
Percentage of Total Businesses:				**94.2**		**5.0**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	1.4	8	1.0	3	10.0	0	0.0
Moderate	62	7.7	59	7.6	3	10.0	0	0.0
Middle	537	66.6	518	66.8	18	60.0	1	100.0
Upper	196	24.3	190	24.5	6	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**806**	**100.0**	**775**	**100.0**	**30**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.2**		**3.7**		**0.1**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Medford, OR MSA and Grants Pass, OR MSA for the year of loan origination. The tables below show the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Medford, OR MSA					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	**$58,900**	0 - $29,449	$29,450 - $47,119	$47,120 - $70,679	$70,680 - & above
2019	**$66,300**	0 - $33,149	$33,150 - $53,039	$53,040 - $79,559	$79,560 - & above
2020	**$65,100**	0 - $32,549	$32,550 - $52,079	$52,080 - $78,119	$78,120 - & above

Borrower Income Levels Grants Pass, OR MSA					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	**$53,600**	0 - $26,799	$26,800 - $42,879	$42,880 - $64,319	$64,320 - & above
2019	**$48,800**	0 - $24,399	$24,400 - $39,039	$39,040 - $58,559	$58,560 - & above
2020	**$57,800**	0 - $28,899	$28,900 - $46,239	$46,240 - $69,359	$69,360 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Medford, OR MSA, and Grants Pass, OR MSA, which was $53,441 and $46,452, respectively, for each year of the evaluation period.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 291,772. The largest age group of the AA is people who are 25 to 64 years of age, which comprises 50.5% of the AA's population. The remaining age groups are as follows: residents 17 years and younger (20.8%), residents aged 18 to 24 years (7.9%), and residents aged 65 years and older (20.8%). Bank management indicated that overall population growth has been steady, although it has slowed since the pandemic.

Housing Information. According to 2020 FFIEC adjusted census data, this AA has 129,810 housing units: 57.5% are owner-occupied, 33.4% are rental units, and 9.1% are vacant. The median age of the housing stock is 40 years, which is slightly higher than the statewide median of 38. The median housing value is $217,386 and the affordability ratio is 19.4, which is slightly below that of the state at 21.6. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

A community contact and bank management indicated that affordable housing is a significant concern in the area and that a devastating wildfire in 2020 exacerbated the issue. Approximately 3,000 homes and buildings, most of which were homes, were destroyed in Jackson County according to bank management. Further, much of the housing impacted by the fire were mobile home parks and apartments located in lower-income neighborhoods. Bank management indicated that rebuilding is underway, but many residents left the area in search of new housing and other opportunities. A contact indicated that rebuilding of homes has been slowed by labor and materials shortages due to the pandemic. Overall, though, the area's population has been growing. This growth has contributed to increases in home prices. According to bank management, the average price of a home in 2018 was $270,000 and in 2020 was approximately $330,000, which is not affordable for LMI individuals. Josephine County has homes that are more affordable, and some residents of this county commute to Jackson County for work. Bank management indicated that homelessness is also a concern in the area.

The table below shows the housing cost burden in the AA (CSA), the MSAs, and the state of Oregon, for individuals of different income levels. As reflected in the table, individuals in both the low- and moderate-income brackets for both renter and homeowner categories exceed HUD's 30% cost-burden threshold, although the difference is greater for low-income individuals. Overall, the housing cost burden for renters and homeowners in the AA is higher than the burden for those in statewide Oregon, although homeowners fared better in the AA.

Medford-Grants Pass, OR CSA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Medford-Grants Pass, OR CSA	81%	67%	52%	73%	48%	29%
Jackson County, OR	83%	70%	51%	76%	49%	30%
Josephine County, OR	78%	61%	53%	66%	46%	29%
Grants Pass, OR MSA	78%	61%	53%	66%	46%	29%
Medford, OR MSA	83%	70%	51%	76%	49%	30%
Oregon	81%	57%	47%	70%	48%	25%
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						

General Economic and Business Information. Overall, the economy has been resilient and growing despite a devastating wildfire and the pandemic, according to bank management. Medford is a regional trade center and is located along Interstate 5, which is ideal for manufacturing companies, with Portland, Oregon, to the north and San Francisco, California, to the south. Health care, manufacturing, and education are primary industries. Bank management indicated that agriculture is also an important industry in Josephine County and that agritourism is growing and strong with many wineries and vineyards in the area. As in other parts of Oregon, year-round recreational opportunities including fishing, hiking, rafting, and skiing are available and tourism is important to the health of the regional economy. During the pandemic, the service and hospitality industries experienced significant challenges. Bank management indicated that access to PPP funds and enhanced unemployment benefits assisted in keeping local economies vibrant. Businesses have experienced staffing shortages, and competition for skilled workers is an ongoing challenge for many employers. There have been no major layoffs or business closures in the area according to bank management. A contact indicated that the primary need of the community is revitalization due to the wildfires.

As shown in the Unemployment Rates chart, the annual average unemployment rate for the AA was above that of the state. The unemployment rate in all areas increased from 2019 to 2020 due to the pandemic.

Medford-Grants Pass, OR CSA Unemployment Rates			
Area	**2018**	**2019**	**2020**
Medford-Grants Pass, OR CSA	4.82%	4.43%	7.83%
Jackson County, OR	4.63%	4.27%	7.81%
Josephine County, OR	5.38%	4.88%	7.88%
Grants Pass, OR MSA	5.38%	4.88%	7.88%
Medford, OR MSA	4.63%	4.27%	7.81%
Oregon	4.01%	3.70%	7.58%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEDFORD-GRANTS PASS CSA AA

The bank's Lending Test performance in the Medford-Grants Pass CSA AA is good. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes. Overall, the geographic distribution of loans is also good. The bank is a leader in making community development loans. Overall, the bank uses flexible loan programs, notably PPP lending, to help meet credit needs. Examiners assigned the most weight to small business loans, since small business loans were the leading product by number and dollar during the evaluation period, followed by HMDA and consumer loans, which received less but equal weight. Examiners did not include the bank's small farm lending in the analysis because agricultural loans are not a major product for this AA, based on volume.

Overall, the Investment Test performance in the Medford-Grants Pass CSA AA is significant, and the bank's qualified investments demonstrate good responsiveness to credit and community development needs. The bank made an excellent level of qualified investments in the form of donations. The bank did not make any non-donation investments, which is adequate given performance context.

Under the Service Test, the bank's delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank is a leader in providing community development services in the AA.

LENDING TEST

The bank's Lending Test performance in the Medford-Grants Pass CSA AA is good.

Lending Activity

The bank's lending activity reflects good responsiveness to AA credit needs. For HMDA loans, the bank ranked 29th among 318 reporting HMDA loans in 2019 and 30th among 349 lenders in 2020. The bank's market share of HMDA lending averaged 0.8% for both years. For small business lending, the bank ranked 12th out of 76 lenders reporting CRA data in 2019 and 12th among 97 reporters in 2020. The bank's market share for small business loans was 1.4% in 2019 and higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented 1.9% by number and 1.6% by dollar amount of the bank's total lending. Within the bank's Oregon AAs, the lending activity in the Medford-Grants Pass CSA AA was 15.8% by number and 11.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. At the product level, examiners evaluated home purchase, refinance, home improvement, and other purpose LOC loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Medford-Grants Pass, OR CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.1	0	0.0	1.1	0	0.0	2.1	0	0.0	1.1	20.6
Moderate	3	23.1	14.0	381	10.5	10.2	6	27.3	14.9	866	12.2	10.7	18.5
Middle	2	15.4	23.7	386	10.7	20.9	4	18.2	26.0	1,007	14.2	23.5	19.6
Upper	7	53.8	48.1	2,423	67.0	55.9	9	40.9	47.8	4,440	62.5	55.8	41.2
Unknown	1	7.7	12.1	429	11.9	11.8	3	13.6	9.2	787	11.1	8.9	0.0
Total	13	100.0	100.0	3,619	100.0	100.0	22	100.0	100.0	7,100	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.8	0	0.0	3.1	2	3.5	2.5	228	1.7	1.4	20.6
Moderate	6	23.1	13.8	1,199	20.2	9.8	10	17.5	11.9	965	7.3	8.6	18.5
Middle	4	15.4	19.4	888	15.0	17.0	13	22.8	19.6	2,565	19.3	17.1	19.6
Upper	16	61.5	41.7	3,840	64.8	47.8	29	50.9	43.9	8,652	65.1	49.2	41.2
Unknown	0	0.0	20.4	0	0.0	22.3	3	5.3	22.1	881	6.6	23.7	0.0
Total	26	100.0	100.0	5,927	100.0	100.0	57	100.0	100.0	13,291	100.0	100.0	100.0
Home Improvement Loans													
Low	1	4.3	5.0	50	2.1	4.0	2	7.1	5.5	82	3.9	4.1	20.6
Moderate	4	17.4	11.8	190	7.8	10.9	3	10.7	12.6	90	4.3	9.5	18.5
Middle	3	13.0	23.5	149	6.1	18.5	8	28.6	23.1	466	22.1	20.8	19.6
Upper	15	65.2	56.4	2,050	84.1	63.8	14	50.0	55.2	1,375	65.2	62.1	41.2
Unknown	0	0.0	3.3	0	0.0	2.9	1	3.6	3.6	95	4.5	3.4	0.0
Total	23	100.0	100.0	2,439	100.0	100.0	28	100.0	100.0	2,108	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Medford-Grants Pass, OR CSA

Total Home Mortgage Loans													
Low	2	2.1	3.4	110	0.7	2.0	5	3.2	2.5	330	1.2	1.3	20.6
Moderate	20	20.8	13.7	2,114	14.4	10.0	24	15.6	12.8	2,158	8.1	9.3	18.5
Middle	15	15.6	21.7	1,711	11.6	19.0	34	22.1	21.5	4,530	17.0	19.3	19.6
Upper	58	60.4	46.0	10,325	70.3	52.4	82	53.2	45.4	17,645	66.4	51.6	41.2
Unknown	1	1.0	15.3	429	2.9	16.6	9	5.8	17.8	1,929	7.3	18.5	0.0
Total	96	100.0	100.0	14,689	100.0	100.0	154	100.0	100.0	26,592	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level
Assessment Area: Medford-Grants Pass, OR CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	2.9	3.4	60	2.2	2.6	1	2.1	3.7	20	0.5	3.3	20.6
Moderate	7	20.6	13.2	344	12.7	8.8	5	10.6	8.9	237	5.8	6.0	18.5
Middle	6	17.6	22.3	288	10.7	18.9	9	19.1	19.5	492	12.0	13.1	19.6
Upper	20	58.8	57.4	2,012	74.4	66.0	30	63.8	65.9	3,178	77.6	76.5	41.2
Unknown	0	0.0	3.8	0	0.0	3.8	2	4.3	2.0	166	4.1	1.1	0.0
Total	34	100.0	100.0	2,704	100.0	100.0	47	100.0	100.0	4,093	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.3	0	0.0	1.2	0	0.0	3.8	0	0.0	1.7	20.6
Moderate	0	0.0	16.5	0	0.0	12.8	0	0.0	15.7	0	0.0	10.9	18.5
Middle	0	0.0	21.9	0	0.0	14.6	0	0.0	24.5	0	0.0	26.5	19.6
Upper	0	0.0	57.1	0	0.0	69.7	0	0.0	49.1	0	0.0	55.0	41.2
Unknown	0	0.0	2.3	0	0.0	1.7	0	0.0	6.9	0	0.0	5.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.5
Middle	0	0.0	2.0	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	19.6
Upper	0	0.0	2.0	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	41.2
Unknown	0	0.0	95.9	0	0.0	96.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank's overall lending to low-income borrowers was comparable to aggregate lenders. The bank's overall lending to moderate-income borrowers in 2019 was above aggregate lenders and in 2020 was consistent. The bank and aggregate lenders were both below demographics for overall lending to low- and moderate-income borrowers. Based on 2019 and 2020 FFIEC adjusted census data, 20.6% of the families in the AA are low income and 18.5% are moderate income.

The bank's market share of HMDA loans in the AA is very small. Bank management indicated that the bank competes with many institutions for HMDA loans, including credit unions, mortgage companies, and regional banks. In 2020, for example, the leading HMDA lender in the market was a mortgage company. Further, as discussed, a community contact and bank management noted the area's significant affordable housing concerns, which the 2020 wildfire exacerbated.

Given the context discussed above, the bank's overall performance in lending to low- and moderate-income borrowers each year is good. For the products analyzed and for each year, the bank's lending to low-income borrowers is typically comparable to aggregate lending and to moderate-income borrowers either exceeds or is consistent with aggregate lending.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $65,100 for the Medford MSA, an individual with the highest income in the low-income bracket ($32,549) could afford a $97,647 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($52,079) could afford a $156,237 home. According to 2020 FFIEC adjusted census data, the median housing value in the Medford MSA is $218,079. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers. Bank management indicated that the average home price in Jackson County is $327,000, which is not affordable for many first-time homebuyers.

In this AA, the bank made use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in FHA and VA programs. During the evaluation period, the bank made loans through these programs totaling approximately $1.8 million. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

The bank's 2018 HMDA lending is generally consistent with its performance for 2019 and 2020.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Medford-Grants Pass, OR CSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	3	14.3%	81	16.1%
Moderate	3	14.3%	136	27.0%	3	14.3%	38	7.6%
Low/Moderate Total	3	14.3%	136	27.0%	6	28.6%	119	23.7%
Middle	14	66.7%	236	46.9%	2	9.5%	40	8.0%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Medford-Grants Pass, OR CSA								
Upper	4	19.0%	131	26.0%	11	52.4%	303	60.2%
Unknown	0	0.0%	0	0.0%	2	9.5%	41	8.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	503	100.0%	21	100.0%	503	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	7.7%	9	1.3%
Moderate	3	11.5%	20	2.9%	7	26.9%	130	18.8%
Low/Moderate Total	3	11.5%	20	2.9%	9	34.6%	139	20.1%
Middle	17	65.4%	487	70.3%	4	15.4%	153	22.1%
Upper	6	23.1%	186	26.8%	12	46.2%	377	54.4%
Unknown	0	0.0%	0	0.0%	1	3.8%	24	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	693	100.0%	26	100.0%	693	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	18	23.1%	154	14.9%
Moderate	5	6.4%	83	8.0%	15	19.2%	160	15.4%
Low/Moderate Total	5	6.4%	83	8.0%	33	42.3%	314	30.3%
Middle	52	66.7%	613	59.1%	21	26.9%	340	32.8%
Upper	21	26.9%	341	32.9%	21	26.9%	360	34.7%
Unknown	0	0.0%	0	0.0%	3	3.8%	23	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	1,037	100.0%	78	100.0%	1,037	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	23	18.4%	244	10.9%
Moderate	11	8.8%	239	10.7%	25	20.0%	328	14.7%
Low/Moderate Total	11	8.8%	239	10.7%	48	38.4%	572	25.6%
Middle	83	66.4%	1,336	59.8%	27	21.6%	533	23.9%
Upper	31	24.8%	658	29.5%	44	35.2%	1,040	46.6%
Unknown	0	0.0%	0	0.0%	6	4.8%	88	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	125	100.0%	2,233	100.0%	125	100.0%	2,233	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Medford-Grants Pass, OR CSA								
	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	21.4%	27	8.3%	1	7.1%	32	9.8%
Low/Moderate Total	3	21.4%	27	8.3%	1	7.1%	32	9.8%
Middle	6	42.9%	128	39.4%	4	28.6%	98	30.2%
Upper	5	35.7%	170	52.3%	8	57.1%	170	52.3%
Unknown	0	0.0%	0	0.0%	1	7.1%	25	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	325	100.0%	14	100.0%	325	100.0%
	Other – Secured							
Low	0	0.0%	0	0.0%	3	8.6%	32	3.1%
Moderate	2	5.7%	45	4.4%	2	5.7%	62	6.1%
Low/Moderate Total	2	5.7%	45	4.4%	5	14.3%	94	9.2%
Middle	22	62.9%	687	67.4%	7	20.0%	130	12.7%
Upper	11	31.4%	288	28.2%	22	62.9%	790	77.5%
Unknown	0	0.0%	0	0.0%	1	2.9%	6	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	1,020	100.0%	35	100.0%	1,020	100.0%
	Other – Unsecured							
Low	1	1.1%	10	0.5%	17	18.3%	168	9.0%
Moderate	14	15.1%	233	12.5%	18	19.4%	236	12.7%
Low/Moderate Total	15	16.1%	243	13.1%	35	37.6%	404	21.7%
Middle	55	59.1%	1,001	53.8%	17	18.3%	340	18.3%
Upper	23	24.7%	615	33.1%	38	40.9%	1,048	56.4%
Unknown	0	0.0%	0	0.0%	3	3.2%	67	3.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	93	100.0%	1,859	100.0%	93	100.0%	1,859	100.0%
	Consumer Loan Totals							
Low	1	0.7%	10	0.3%	20	14.1%	200	6.2%
Moderate	19	13.4%	305	9.5%	21	14.8%	330	10.3%
Low/Moderate Total	20	14.1%	315	9.8%	41	28.9%	530	16.5%
Middle	83	58.5%	1,816	56.7%	28	19.7%	568	17.7%
Upper	39	27.5%	1,073	33.5%	68	47.9%	2,008	62.7%
Unknown	0	0.0%	0	0.0%	5	3.5%	98	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	142	100.0%	3,204	100.0%	142	100.0%	3,204	100.0%

In 2019 and 2020, the bank's overall lending to low-income borrowers is below demographics. The bank's overall lending to moderate-income borrowers is above demographics in 2019 and consistent with demographics in 2020. According to 2019 and 2020 FFIEC adjusted census data, 23.7% of the

households in the AA are low income and 16.4% are moderate income. Bank management indicated that the bank faces especially strong competition for consumer loans from credit unions.

By product and for each year, the highest level of lending to low-income borrowers was in other-unsecured loans. Bank management indicated that these loans can be for living expenses, car repairs, or health care needs. In addition, the bank's lending to moderate-income borrowers was typically either consistent with or exceeded aggregate lenders.

The bank continues to offer small-dollar consumer loans. The bank originated 8.2% of all consumer loans in the AA for $3,000 or less. Of these small dollar consumer loans, approximately 72.7% were to LMI borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the LMI borrowers in the AA.

Finally, the bank's 2018 consumer lending is generally consistent with its 2019 and 2020 consumer lending.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Medford-Grants Pass, OR CSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	54	58.7	50.1	2,271	22.4	35.9	76	16.2	44.1	7,338	17.0	27.1	94.2
Over $1 Million	38	41.3		7,864	77.6		47	10.0		10,368	24.0		5.0
Revenue Unknown	0	0.0		0	0.0		346	73.8		25,520	59.0		0.8
Total	92	100.0		10,135	100.0		469	100.0		43,226	100.0		100.0
By Loan Size													
$100,000 or Less	68	73.9	94.9	2,139	21.1	43.4	362	77.2	87.7	10,959	25.4	33.7	
$100,001 - $250,000	11	12.0	2.7	2,024	20.0	14.8	63	13.4	7.0	9,937	23.0	20.1	
$250,001 - $1 Million	13	14.1	2.4	5,972	58.9	41.8	44	9.4	5.3	22,330	51.7	46.2	
Total	92	100.0	100.0	10,135	100.0	100.0	469	100.0	100.0	43,226	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	49	90.7		1,202	52.9		62	81.6		1,606	21.9		
$100,001 - $250,000	3	5.6		525	23.1		5	6.6		927	12.6		
$250,001 - $1 Million	2	3.7		544	24.0		9	11.8		4,805	65.5		
Total	54	100.0		2,271	100.0		76	100.0		7,338	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses exceeded aggregate lenders in 2019 and was below aggregate lenders in 2020. According to 2019 and 2020 D&B data, 93.9% and 94.2% of businesses had gross annual revenues of $1 million or less, respectively. For both years, the bank and aggregate lenders were below demographic data. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less, as shown in the table. However, over 2019 and 2020, the bank originated 76.6% of its small business loans for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with many financial institutions, including large national banks, as well as credit card lenders, who are ranked higher in market share in the AA.

The bank's lending to businesses with unknown revenue significantly increased from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of the applicants. In 2020, the bank made extensive use of this program; these loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated over 300 PPP loans (with loan amounts of $1.0 million or less) for over $25.0 million in this AA, of which more than half were for amounts of $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and its performance is excellent.

The bank's 2018 small business lending is generally consistent with its 2019 small business lending performance.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's small business, HMDA, and consumer loans in the AA is good and does not reveal any unexplained gaps in lending. The AA has one low-income and 10 moderate-income tracts. Middle-income tracts are the highest by number and represent 57.9% of tracts in the AA. One branch is located in the low-income tract and two branches are located in moderate-income tracts. Further, the four remaining offices located in either middle- or upper-income tracts are very near the low-income tract and/or moderate-income tracts. The low-income tract and six moderate-income tracts are located in Medford. Two moderate-income tracts are in Grants Pass and one moderate-income tract is located in Ashland and then the Trail/Shady Cove area.

While the bank did not lend in the low-income tract at times for consumer and HMDA lending, this is reasonable given demographics and strong competition. Further, even though the bank did not make HMDA and consumer loans in all moderate-income tracts for each year, which was explainable by performance context, it made these loans in most moderate-income tracts. For both 2019 and 2020, the bank made small business loans in the low-income tract and typically in each moderate-income tract.

Residential Real Estate. The geographic distribution of HMDA loans is good. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography
Assessment Area: Medford-Grants Pass, OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.4	0	0.0	0.2	0.1
Moderate	3	23.1	13.3	471	13.0	11.2	2	9.1	12.7	136	1.9	10.8	10.6
Middle	6	46.2	57.6	1,630	45.0	55.9	15	68.2	58.5	4,797	67.6	57.1	61.2
Upper	4	30.8	29.0	1,518	41.9	32.9	5	22.7	28.5	2,167	30.5	31.9	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	3,619	100.0	100.0	22	100.0	100.0	7,100	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0.1
Moderate	0	0.0	11.0	0	0.0	9.1	4	7.0	9.6	568	4.3	8.2	10.6
Middle	14	53.8	58.6	2,738	46.2	57.3	25	43.9	56.8	5,641	42.4	55.7	61.2
Upper	12	46.2	30.3	3,189	53.8	33.5	28	49.1	33.5	7,082	53.3	36.1	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	5,927	100.0	100.0	57	100.0	100.0	13,291	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.1
Moderate	5	21.7	12.3	344	14.1	10.3	0	0.0	11.6	0	0.0	8.6	10.6
Middle	14	60.9	57.2	1,337	54.8	55.0	18	64.3	51.3	1,386	65.7	53.0	61.2
Upper	4	17.4	30.4	758	31.1	34.7	10	35.7	36.8	722	34.3	38.3	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	2,439	100.0	100.0	28	100.0	100.0	2,108	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	33.3	6.9	515	27.7	10.3	0	0.0	0.0	0	0.0	0.0	3.5
Moderate	1	33.3	34.5	505	27.2	19.1	2	66.7	38.2	775	66.3	25.7	32.1
Middle	1	33.3	48.3	840	45.2	65.0	1	33.3	44.1	394	33.7	55.1	47.5
Upper	0	0.0	10.3	0	0.0	5.6	0	0.0	17.6	0	0.0	19.2	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,860	100.0	100.0	3	100.0	100.0	1,169	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	1.0	0.1	515	3.1	0.2	0	0.0	0.2	0	0.0	0.1	0.1
Moderate	11	11.1	12.2	1,380	8.3	10.3	12	7.6	10.7	1,680	6.1	9.5	10.6
Middle	56	56.6	58.1	8,048	48.6	56.7	84	53.5	57.2	13,782	49.6	56.1	61.2
Upper	31	31.3	29.6	6,606	39.9	32.8	61	38.9	32.0	12,299	44.3	34.3	28.1

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Medford-Grants Pass, OR CSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	99	100.0	100.0	16,549	100.0	100.0	157	100.0	100.0	27,761	100.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Medford-Grants Pass, OR CSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	2	5.9	8.2	60	2.2	6.1	4	8.5	7.3	201	4.9	5.2	10.6
Middle	21	61.8	60.8	1,503	55.6	58.5	25	53.2	54.1	1,564	38.2	51.6	61.2
Upper	11	32.4	31.0	1,141	42.2	35.5	18	38.3	38.6	2,328	56.9	43.1	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	2,704	100.0	100.0	47	100.0	100.0	4,093	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	10.0	0	0.0	8.4	0	0.0	9.4	0	0.0	4.1	10.6
Middle	0	0.0	61.3	0	0.0	56.1	0	0.0	58.5	0	0.0	59.9	61.2
Upper	0	0.0	28.4	0	0.0	35.4	0	0.0	32.1	0	0.0	36.0	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.7	0	0.0	0.3	0.1
Moderate	0	0.0	15.3	0	0.0	11.6	0	0.0	16.3	0	0.0	13.8	10.6
Middle	0	0.0	56.1	0	0.0	57.6	0	0.0	64.1	0	0.0	59.8	61.2
Upper	0	0.0	28.6	0	0.0	30.8	0	0.0	19.0	0	0.0	26.1	28.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

The bank extended one HMDA loan in the low-income tract in 2019 and zero in 2020, which is reasonable given that only 0.4% of families and 0.1% of owner-occupied units in the AA are located here,

according to 2019 and 2020 FFIEC adjusted census data. The same data shows that most housing units are rental units (81.3%) or vacant (7.9%) in the low-income tract. The bank's HMDA lending in the low-income tracts is consistent with aggregate lenders, as shown in the table. The low-income tract is in downtown Medford where restaurants, small shops, and motels operate, for example, and there are limited HMDA lending opportunities.

The bank made 11.1% of its HMDA loans in 2019 to borrowers residing in moderate-income tracts, which is comparable to aggregate lenders who reported 12.2% and to demographic data in the table. In 2020, the bank made 7.6% of its HMDA loans to borrowers residing in moderate-income tracts, which is slightly below aggregate lenders, who reported 10.7%, and is consistent with demographic data. In 2019, the bank made loans in all but four of the moderate-income tracts (3605.00, 5.01, 16.01, and 27.00). Tract 3605.00 is located in Grants Pass in Josephine County, where many other financial institutions operate. Tracts 5.01 and 16.01 are located in Medford in Jackson County, also where many other financial institutions operate. Tract 27.00 is in the north central portion of Jackson County, where the bank does not operate an office. There is forestland here, and it is a recreational area. Similarly, in 2020, the bank made loans in all but five of the moderate-income tracts (3607.01, 5.01, 5.02, 16.01, and 27.00). Tract 3607.01 is adjacent to tract 3605.00 described above and is also located in Grants Pass. Tract 5.02 is adjacent to tract 5.01 described above and is also in Medford; according to bank management, not many single-family homes are located in these two tracts. While the bank did not make loans in every moderate-income tract each year, it made loans in most, which is notable given strong competition and the bank's small HMDA market share.

The bank's HMDA lending in the one low- and several moderate-income tracts in 2018 is generally consistent with its performance in 2019 and 2020.

Consumer. The geographic distribution of consumer loans is good. At the product level, examiners evaluated all loan types based on number volume. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

In 2019 and 2020, the bank's lending in the low-income tract is consistent with demographics. Adjusted FFIEC census data for 2019 and 2020 indicates that just 0.7% of households in the AA reside in the low-income tract and 15.2% reside in moderate-income tracts. The bank did not make any consumer loans in the low-income tract in 2019, which is reasonable given demographics. In 2019 and 2020, the bank's lending in the moderate-income tracts is either below, which is reasonable given performance context, or consistent with demographics. In both 2019 and 2020, the bank made consumer loans in most moderate-income tracts. The bank did not make any consumer loans in three moderate-income tracts in 2019 (2.01 and 5.01 in Medford and 19.00 in Ashland) and one moderate-income tract in 2020 (5.02 in Medford). Bank management indicated that competition is strong for consumer loans, particularly with credit unions, and that other financial institutions operate in the area of the low- and moderate-income tracts in Medford and the moderate-income tract in Ashland. Further, bank management indicated that some of these tracts have fewer residents than other areas of the bank's AA given the presence of commercial entities and city offices. By product, the bank's motor vehicle lending in moderate-income tracts in 2020 was above demographics.

The bank's consumer lending in the one low- and several moderate-income tracts overall in 2018 is stronger than its performance in 2019 and 2020.

Small Business. The overall geographic distribution of small business loans is excellent. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Medford-Grants Pass, OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	6	6.5	3.6	1,071	10.6	4.6	31	6.6	4.7	1,849	4.3	5.7	4.2
Moderate	22	23.9	13.4	1,797	17.7	16.0	111	23.7	15.8	9,999	23.1	16.0	16.9
Middle	37	40.2	55.0	3,606	35.6	57.8	249	53.1	55.1	24,124	55.8	60.5	56.2
Upper	27	29.3	24.6	3,662	36.1	19.6	78	16.6	23.0	7,254	16.8	16.8	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.4	0	0.0	2.1	0	0.0	1.5	0	0.0	1.0	
Total	92	100.0	100.0	10,135	100.0	100.0	469	100.0	100.0	43,226	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank was consistent with both aggregate lenders and demographics with its small business lending in the low-income tract in 2019 and 2020, as the table shows. The bank exceeded both aggregate lenders and demographics with its small business lending in the moderate-income tracts in 2019 and 2020. As previously mentioned, the bank operates three offices in low- and moderate-income tracts. Further, the four remaining offices located in either middle- or upper-income tracts are very near the low-income tract and/or moderate-income tracts. In 2019, the bank extended small business loans in each moderate-income tract except tract 2.02, which is in Medford and close to where other financial institutions operate. In 2020, the bank extended small business loans in each moderate-income tract.

The bank's small business lending in the one low- and several moderate-income tracts in 2018 is generally consistent with its performance in 2019 and 2020.

Community Development Loans

The bank is a leader in making community development loans in this AA. As shown in the table at the right, the bank made four community development loans totaling nearly $4.9 million. The bank made several community development loans that promote affordable housing, which is highly responsive to identified community needs. The bank's largest community development loan, for $3.0 million, is to a business operating in a moderate-income area targeted for growth and investment, which helps to attract and retain businesses and residents. Bank management indicated that competition

Community Development Loans in the Medford-Grants Pass CSA AA

Purpose	#	*$*
Affordable Housing	3	1,859,600
Revitalize or Stabilize	1	3,000,000
Total	**4**	**$4,859,600**

for community development loans in this AA is strong. Overall, the bank's community development loans show excellent responsiveness to community needs.

INVESTMENT TEST

Overall, the bank made a significant level of qualified investments, including donations, in the Medford-Grants Pass CSA AA. The bank did not make any non-donation investments in the AA, which is adequate given performance context. Bank management indicated that the bank faces strong competition for non-donation investments, such as LIHTCs, and that large financial institutions often have the competitive advantage. Further, non-donation investment opportunities are also limited, according to bank management.

The bank made an excellent level of qualified investments in the form of donations as shown in the table at the right. Most donations by dollar and number focused on community services targeted to LMI individuals. These donations helped local organizations provide essential goods and services for those in need, including education for LMI youth, supportive and social services for at-risk youth, and homelessness services. Several of the bank's donations helped organizations provide food or health services at the start of the pandemic in 2020, which is noteworthy. The bank also made $15,100 in donations to help a local nonprofit organization that promotes affordable housing in the area. Overall, the bank's donations show excellent responsiveness to identified community needs.

Qualified Investment Donations in the Medford-Grants Pass CSA AA

Purpose	#	$
Affordable Housing	4	15,100
Community Service	93	105,529
Economic Development	1	500
Total	**98**	**121,129**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and retail services and hours do not vary in a way that inconveniences particular individuals or areas. The bank is a leader in providing community development services.

Retail Services

Delivery systems in the AA are readily accessible to the bank's geographies and to individuals of different income levels. The bank's services and hours do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates six full-service branches in the AA as well as one drive-thru only location, for a total of seven offices. Four offices are in Medford, two are in Grants Pass, and one is in Ashland. Most full-service branches have drive-up facilities and deposit-taking ATMs, and one branch has two deposit-taking ATMs. The bank also operates one stand-alone, deposit-taking ATM in Ashland. The full-service branches and the drive-thru only location offer extended hours, and a few offices also offer weekend hours. One branch is located in the low-income tract and two branches are located in moderate-income tracts. Further, the four remaining offices located in either middle- or upper-income tracts are very near the low-income tract and/or moderate-income tracts. The bank's stand-alone, deposit-taking ATM is located in a middle-income tract very near the moderate-income tract in Ashland.

The following table shows the geographic distribution of branches in this AA.

Geographic Distribution of Branches
Assessment Area: Medford-Grants Pass, OR CSA

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**1**	**14.3%**	**0**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			1	1.8%	0.7%	4.1%
	LS	0		0	0							
Moderate	**Total**	**2**	**28.6%**	**0**	**0**	**2**	**2**	**2**				
	DTO	0		0	0	0			10	17.5%	15.2%	16.5%
	LS	0		0	0							
Middle	**Total**	**3**	**42.9%**	**2**	**0**	**3**	**3**	**0**				
	DTO	1		1	0	1			33	57.9%	59.7%	56.7%
	LS	0		0	0							
Upper	**Total**	**1**	**14.3%**	**0**	**0**	**0**	**1**	**0**				
	DTO	0		0	0	0			13	22.8%	24.4%	22.7%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Totals	**Total**	**7**	**100.0%**	**2**	**0**	**6**	**7**	**2**				
	DTO	1		1	0	1			57	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank is a leader in providing community development services in this AA. The table to the right shows the service activity and purpose category. Approximately 13 bank employees provided 28 community development services for 10 organizations.

The bank's community development services mainly focus on nonprofit organizations that provide essential services to LMI individuals such as financial education

Community Development Services in the Medford-Grants Pass CSA AA	
Purpose	**#**
Community Services	26
Affordable Housing	1
Revitalize or Stabilize	1
Total	**28**

for youth, clubs and programs for at-risk youth, and food. During the evaluation period, bank employees served in various roles for the organizations, such as presenter, board member, and committee member. The bank's services address identified community needs, such as food insecurity and affordable housing.

METROPOLITAN AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EUGENE-SPRINGFIELD, OREGON MSA, ASSESSMENT AREA

The bank operates two branches in this AA that includes the entirety of Lane County, in the west-central portion of the state and along the coast. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. The AA is adjacent to the bank's Bend-Prineville CSA, Klamath Falls-Roseburg, and Newport-Lincoln City AAs. Both of the bank's offices in this AA are in moderate-income tracts. A small portion of trust land for the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians is near the coast in Lane County. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EUGENE-SPRINGFIELD ASSESSMENT AREA

Examiners determined that the bank's lending[39] and investment performance in this AA is consistent with the performance of the full-scope metropolitan AAs. The bank's service performance is below the performance of the full-scope metropolitan AAs based on a lower level of community development services. This performance does not change the conclusion for the state.

The bank made $8.7 million in community development loans benefiting this AA, which is a noteworthy level. The loans helped to revitalize or stabilize low- and/or moderate-income areas and promoted economic development.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PORTLAND-VANCOUVER-SALEM, OREGON-WASHINGTON CSA, ASSESSMENT AREA

The bank operates three branches and one LPO in this AA that includes the entirety of Clackamas, Marion, Multnomah, Polk, and Washington counties in northwestern Oregon and Clark County in southwestern Washington. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. One of the bank's branches and the LPO in this AA are in moderate-income tracts, and the two remaining branches are located in close proximity to low- and/or moderate-income tracts. Mount Hood is on the border between Clackamas and Hood River counties. Small portions of the Grande Ronde Reservation and Warm Springs Reservation are located in the AA. The bank opened the LPO in November 2019. The bank did not close any branches in this AA during the evaluation period.

[39] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA. For small business loans, examiners reviewed the bank's 2020 loan data only due to minimal lending activity in 2019.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PORTLAND-VANCOUVER-SALEM, ASSESSMENT AREA

Examiners determined that the bank's lending[40] and service performance in this AA is generally consistent with the performance of the full-scope metropolitan AAs. The bank's investment performance exceeds the performance of the full-scope metropolitan AAs, based on the level of securities. This performance does not change the conclusion for the state.

The bank made $34.7 million in community development loans benefiting this AA, which is a noteworthy level. The loans helped to promote affordable housing, revitalize or stabilize low- and/or moderate-income areas, and support an organization that provide services to at-risk individuals, including youth. In addition, the bank invested in two MBS totaling $3.8 million benefiting this AA, both involving complex LIHTC projects, which is noteworthy.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF OREGON

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development lending and qualified investments for each AA. The Oregon state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AAs, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review
Oregon Metropolitan Assessment Areas

Assessment Area	*Lending Test*	*Investment Test*	*Service Test*
Eugene-Springfield MSA	Consistent	Consistent	Below
Portland-Vancouver-Salem CSA	Consistent	Exceeds	Consistent

[40] Examiners did not include small farm loans in the analysis because they are not a major business line for this AA and there were none.

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOOD RIVER, OREGON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Hood River County, in northern Oregon bordering Washington. The Columbia River Gorge forms the boundary between the states. Mount Hood is partially in Hood River County, as mentioned. The bank added this AA since the previous evaluation because of a bank acquisition in 2018. The AA is adjacent to the bank's The Dalles, Portland-Vancouver-Salem OR-WA CSA, and Bingen AAs. Small portions of the Warm Springs Reservation are located in northeastern Hood River County. The bank did not close any branches in this AA during the evaluation period. There are no low- or moderate-income census tracts in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOOD RIVER ASSESSMENT AREA

Examiners determined that the bank's lending[41] performance in this AA exceeds the overall state rating. The bank's investment performance is consistent with the performance in the state. The bank's service performance is generally below the performance in the state, based on the lower level of community development services. This performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KLAMATH FALLS-ROSEBURG, OREGON ASSESSMENT AREA

The bank operates five branches in this AA that includes the entirety of Coos, Douglas, and Klamath counties, in the southwestern region of the state. Coos County is along the coast. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. The AA is adjacent to the bank's Medford-Grants Pass CSA, Bend-Prineville CSA, and Eugene-Springfield MSA AAs. The AA includes small portions of several American Indian reservations, as described earlier in the state of Oregon section of this evaluation. Two of the bank's branches in this AA are in moderate-income tracts and one branch is in close proximity to a moderate-income tract. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KLAMATH FALLS-ROSEBURG ASSESSMENT AREA

Examiners determined that the bank's lending[42] and investment performance in this AA is consistent with that of the state. The bank's service performance is generally below the performance in the state, based on the lower level of community development services. This performance does not change the conclusion for the state.

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[41] Examiners did not include the bank's HMDA or consumer loans in the analysis because they are not major business lines for this AA. For small business and small farm loans, examiners reviewed the bank's 2019 and 2020 loan data only due to timing of the bank acquisition.

[42] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MADRAS, OREGON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Jefferson County, in the north central portion of the state. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. The AA is adjacent to the bank's Bend-Prineville CSA, Portland-Vancouver-Salem CSA, and The Dalles AAs. A portion of the Warm Springs Reservation is located in Jefferson County. The bank's branch is in the one moderate-income tract in the AA. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MADRAS ASSESSMENT AREA

Examiners determined that the bank's lending[43] and investment performance in this AA is consistent with that of the state. The bank's service performance is generally below the performance in the state, based on the lower level of community development services. This performance does not change the conclusion for the state.

The bank made two community development loans benefiting this AA totaling $630,068 that supported affordable housing and helped to revitalize a blighted area, which is noteworthy.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEWPORT-LINCOLN CITY, OREGON ASSESSMENT AREA

The bank operates two branches in this AA that includes the entirety of Lincoln County, in the western portion of the state along the coast. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. The AA is adjacent to the bank's Eugene-Springfield MSA and Portland-Vancouver-Salem CSA AAs. The Siletz Reservation is in Lincoln County and includes a number of small land parcels. One of the bank's offices is in the one moderate-income tract in the AA. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEWPORT-LINCOLN CITY ASSESSMENT AREA

Examiners determined that the bank's lending[44] and investment performance in this AA is consistent with that of the state. The bank's service performance is generally below the performance in the state, based on a lower level of community development services. This performance does not change the conclusion for the state.

[43] Examiners did not include the bank's small farm or HMDA loans in the analysis because they are not major business line for this AA. For small business loans, examiners reviewed the bank's 2020 loan data only due to low lending activity in 2019.

[44] Examiners did not include the bank's small farm or HMDA loans in the analysis due to low loan volume. For small business loans, examiners reviewed the bank's 2020 loan data only due to low loan volume in 2019.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SEASIDE, OREGON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Clatsop County, in the northwestern corner of the state, bordering Washington and the coast. The bank added this AA since the previous evaluation because of a bank acquisition in 2017. The AA is adjacent to the bank's Raymond-Westport AA in Washington and the Portland-Vancouver-Salem AA. The bank did not close any branches in this AA during the evaluation period. The AA does not include any low- or moderate-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SEASIDE ASSESSMENT AREA

Examiners determined that the bank's lending[45] performance in this AA is consistent with the overall state rating. The bank's investment and service performance is below the performance in the state, based on a lower level of donations and community development services. This performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE THE DALLES, OREGON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Wasco County, in the north central portion of the state along the border with Washington and the Columbia River. The bank's branch is located in a middle-income tract which is in close proximity to the one moderate-income tract of the AA. The bank added this AA since the previous evaluation because of a bank acquisition in 2018. The AA includes portions of the Warm Springs Reservation as well as Celilo Village, as previously mentioned in the state of Oregon section of the evaluation. The bank did not close any branches in this AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE THE DALLES ASSESSMENT AREA

Examiners determined that the bank's lending[46] performance in this AA exceeds the overall state rating. The bank's investment performance is consistent with the performance in the state. The bank's service performance is below the performance in the state, based on a lower level of community development services. This performance does not change the conclusion for the state.

The bank made one community development loan for $50,000, which is notable; the loan supported an organization that provides essential services to individuals in need.

[45] Examiners did not include the bank's HMDA, small farm, and consumer loans in the analysis due to low loan volume. For small business loans, examiners reviewed 2020 loan data only due to low loan volume in 2019.

[46] Examiners did not include the bank's small farm, HMDA, or consumer loans in the analysis due to low loan volume. For small business loans, examiners reviewed the bank's 2020 loan data only due to timing of the bank acquisition and minimal lending activity in 2019.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF OREGON

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Oregon state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AAs, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Oregon Assessment Areas			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Hood River	Exceeds	Consistent	Below
Klamath Falls-Roseburg	Consistent	Consistent	Below
Madras	Consistent	Consistent	Below
Newport-Lincoln City	Consistent	Consistent	Below
Seaside	Consistent	Below	Below
The Dalles	Exceeds	Consistent	Below

IDAHO

CRA RATING FOR Idaho: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Outstanding

Major factors supporting the rating include the following:

- The bank's lending activity in the Idaho AAs shows good responsiveness to local credit needs.
- The lending to businesses of different sizes and to LMI borrowers is good.
- The geographic distribution of loans throughout the AAs is good.
- The bank is a leader in making community development loans.
- The bank makes extensive use of flexible loan programs in its Idaho branches.
- Overall, by number and dollar amount, the bank has a significant level of qualified investments (including donations), which exhibits good responsiveness to credit and community development needs.
- Bank retail services are generally readily accessible to businesses and residents throughout the AAs. Overall, the bank is a leader in providing community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Idaho is generally consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Boise City-Mountain Home-Ontario, ID-OR CSA (Boise City CSA) AA.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Coeur d'Alene MSA AA and the Ketchum AA in Idaho. Examiners evaluated whether the bank's performance in the limited scope metropolitan AA was consistent with its performance in the full-scope AA. The limited-scope nonmetropolitan AA is compared against the bank's state performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN IDAHO

Assessment Area Information. The bank had three AAs in Idaho during the evaluation period. These AAs are new since the previous evaluation because of bank acquisitions in 2017, 2018, and 2019.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks eighth among 30 FDIC-insured institutions in Idaho, with 4.7% of the state's deposits. As of that same date, the bank has $1.5 billion in deposits in Idaho, which represent 11.6% of the bank's total deposits. Two large national banks have the highest percentages of the state's deposits, totaling 37.4%. Generally, the bank operates in a competitive environment in its Idaho AAs; the AAs include various types of financial institutions, including small regional and large national banks. Credit unions also compete for deposits as well as loans; credit union deposits are not included in the FDIC Deposit Market Share Report. The bank also competes with online mortgage lenders and other non-bank mortgage lenders for loans.

According to 2020 FFIEC adjusted census data, the Idaho AAs are comprised of 130 census tracts: six low-, 34 moderate-, 59 middle-, and 31 upper-income tracts.[47] The AAs do not include any nonmetropolitan middle-income tracts classified as distressed and underserved.

One of the Idaho AAs includes an American Indian reservation. Specifically, the Coeur d'Alene MSA AA includes a portion of the Coeur d'Alene Reservation, in northwestern Idaho along the Idaho and Washington borders.

Population. According to 2020 FFIEC adjusted census data, the total population of the Idaho AAs is 852,762, which represents 52.8% of the state's population (1,616,547).[48] The data also shows that the majority (75.5%) of families reside in middle- and upper-income census tracts. Overall, 13.9% of households and 10.1% of families are below the poverty level. The data for the Idaho AAs shows that residents 25 to 64 years of age represent 51.7% of the AA population. The remaining age groups are as follows: 26.3% for residents 17 years and younger, 13.1% for residents 65 years and older, and 9.0% for residents aged 18 to 24 years.

Bank management noted that the AAs have experienced continued population growth and that growth intensified in 2020 due to the pandemic. More people gained the ability to work remotely, and desired to have additional outdoor recreational opportunities and the lifestyle offered in the state of Idaho.

General Economic and Housing Information. Generally, economic conditions in the bank's Idaho AAs fared relatively well during the evaluation period despite the onset of the coronavirus pandemic in 2020. Two of the bank's Idaho AAs, the Boise City CSA AA and the Coeur d'Alene MSA AA, are the most populous and more urban in nature than the third AA, although both include some rural areas as well as forest land. The third AA, Ketchum, is adjacent to the Boise City CSA AA. Generally, the Boise City CSA AA and the Coeur d'Alene MSA AA are diverse with some similar industries, including tourism, health care, education, and technology. Tourism is also important for the Ketchum economy, given the presence of desirable outdoor recreation, such as skiing, and includes related hospitality and retail businesses. Agriculture also impacts the economies in southern Idaho. During the pandemic, area businesses shifted to different business models for a short period of time and tourism slowed drastically. However, tourism increased later in 2020 when people sought out outdoor recreation. Many businesses participated in government programs for monetary assistance to help keep employees paid during pandemic-related limited operations and closures. In general, some businesses also experienced a shortage of workers and/or increased business costs. Despite the impact of the pandemic in 2020, construction and development also occurred during the evaluation period.

In general, housing demand and prices increased, and availability of homes declined. While housing prices were increasing pre-pandemic, the number of people relocating to areas in the bank's AAs increased notably after the start of the pandemic and contributed to increased housing prices and decreased availability.

According to 2020 FFIEC adjusted census data, in the Idaho AAs, 61.7% of the housing was owner-occupied, 29.1% was rental, and 9.2% was vacant. The median housing value was $170,720 for the Idaho AAs; Malheur County in Oregon, Canyon County, and Payette County had similar and the lowest values, $127,000, $122,200, and $129,300, respectively, and Blaine County had the highest value ($374,800). In

[47] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.
[48] The population of the Idaho AAs includes the population of one tract in Malheur County, in the state of Oregon, which is part of the Boise City-Mountain Home-Ontario, ID-OR CSA AA.

the Idaho AAs, the median age of housing stock was 30 years and the median age of housing stock ranges from 23 to 42 years.

As stated previously, generally, the bank operates in competitive markets in Idaho. Various types of financial institutions and creditors operate in the AAs, and as a result, the competition for loans, deposits, and community development activities is generally strong.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IDAHO

Examiners based the bank's Idaho evaluation on a full-scope review of the Boise City CSA AA and limited-scope reviews of the remaining Idaho AAs. A detailed discussion of the bank's performance in the full-scope AA and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Idaho is satisfactory based on the bank's performance under the Lending, Investment, and Service Tests. The ratings below primarily reflect the bank's performance in the full-scope AA.

The Lending Test rating is high satisfactory. The bank's lending activity reflects good responsiveness to credit needs throughout the Idaho AAs. Overall, the distribution of HMDA and consumer loans by income and small business by revenue size of borrowers is good. The geographic distribution of loans is good. The bank is a leader in providing community development loans. Overall, the bank extensively uses flexible loan programs (notably PPP loans, in addition to mortgage loan programs) in its Idaho AAs to help meet credit needs.

The Investment Test rating is high satisfactory. Overall, qualified investments, including donations, are significant and demonstrate good responsiveness to community development needs. The bank lacks qualified non-donation investments, which is adequate given performance context, and the bank has an excellent level of donations.

The Service Test rating is outstanding. Generally, the bank's delivery systems are readily accessible throughout the bank's Idaho AAs. The bank's business hours and services do not vary in a way that inconveniences certain individuals or areas. The bank is a leader in providing community development services.

LENDING TEST

The Lending Test rating is high satisfactory for Idaho.

Lending Activity

The bank's lending levels reflect good responsiveness to credit needs in its Idaho AAs. The table below shows the bank's lending in its Idaho AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the Idaho Assessment Areas				
Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	1,659	27.8	433,228	64.8
Small Business-reportable	2,079	34.9	181,491	27.1
Small Farm-reportable	23	36.9	2,793	7.7
Consumer-optional reportable	2,198	0.4	51,372	0.4
Total Loans	5,959	100.0	668,884	100.0

The Idaho AAs account for 7.7% by number and 8.5% by amount of the bank's lending activity during the evaluation period. Small business lending increased from 2019 to 2020 due to the bank's PPP lending. In addition, HMDA lending increased from 2019 to 2020, which bank management attributes to increased refinance activity given the interest rate environment.

In its Idaho AAs, the bank was not typically among the leading lenders for CRA- and HMDA-reportable loans, with some exceptions involving small business lending in 2020 due to PPP loans.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the Idaho AAs. In addition, the geographic distribution of loans is good. The bank extends loans in census tracts of all income levels, including low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Test section for the Boise City CSA AA. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

During the evaluation period, the bank made loans through flexible loan programs totaling over $114.0 million in its Idaho AAs (including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

Community Development Loans

Idaho Community Development Loans		
Purpose	*#*	*$*
Affordable Housing	3	3,292,479
Economic Development	2	6,230,961
Total	**5**	9,523,440

Given the bank's presence in Idaho, the bank is a leader in making community development loans. This conclusion primarily reflects the bank's performance in the full-scope AA. As shown in the table at right, the bank made five community development loans totaling $9.5 million. Four of the five loans benefited the bank's Boise City CSA AA. The remaining loan, in the amount of $217,000, supported affordable housing in the state of Idaho. The bank did not make community development loans in the Coeur d'Alene MSA and Ketchum AAs.

Most community development loan dollars (65.4%) supported economic development, resulting in the creation of additional jobs for LMI individuals. In addition, the remaining community development loan dollars supported multifamily affordable housing. Overall, the bank's community development lending is very responsive to the needs of the Boise City CSA AA and the state of Idaho.

Given this responsiveness, examiners can also consider any qualified community development loans benefiting geographies outside the bank's AAs. The bank originated one loan for approximately $3.2 million that was outside the Idaho AAs. This loan helped revitalize and stabilize a moderate-income area in Idaho. The table above does not include this loan.

INVESTMENT TEST

The bank's Investment Test rating is high satisfactory for Idaho. The bank has an overall significant level of qualified investments, including donations, demonstrating good responsiveness to credit and community development needs.

The bank did not make non-donation investments in the Idaho AAs or benefiting a regional or statewide area in Idaho during the evaluation period, which is adequate given performance context. The bank also did not have any prior-period investments in the Idaho AAs or benefiting a regional or statewide area in Idaho.

Donations. The bank made an excellent level of donations during the evaluation period. Most donations ($487,137) directly benefited the bank's Idaho AAs. The bank also made $127,306 in donations that benefited regional and statewide areas that include the bank's AAs. The following table shows the distribution of donations by AA, as well as at the regional and statewide level.

Idaho Qualified Investment Donations		
Assessment Area	**Total**	
	#	*$*
Boise City CSA	241	377,927
Coeur d'Alene MSA	65	107,210
Ketchum	2	2,000
Regional Idaho	27	41,036
Statewide Idaho	30	86,270
Total	365	614,443

Most donations, by number and dollar, benefited the bank's Boise City CSA AA. The bank made donations in all of its Idaho AAs. Most donations were to organizations that provide services to LMI individuals, including those at the regional or statewide level that includes the bank's AAs. The bank supported the provision of youth programs, job training, emergency housing, supplies for basic needs, and food through its donations. The bank made some larger donations to support food accessibility, at the AA and statewide level, and to help provide access to child care in the Boise City CSA AA during the pandemic. The bank also made donations supporting affordable housing in two AAs as well as at a statewide level. The bank's donations that addressed food insecurity during the pandemic, as well as affordable housing, are particularly noteworthy. Overall, the bank's donations show excellent responsiveness to identified community needs.

Because the bank's donations address needs in its Idaho AAs, examiners also considered the bank's donations provided outside of its Idaho AAs. The bank made two donations totaling $2,500 that benefited areas outside of its Idaho AAs. These donations support organizations that provide services to LMI individuals. The table above does not include these donations.

SERVICE TEST

The Service Test rating is outstanding for Idaho. This conclusion primarily reflects the bank's performance in the full-scope AA. Delivery systems are generally readily accessible to all portions of the Idaho AAs. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not vary in a way that inconveniences certain people or areas. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Finally, the bank is a leader overall in providing community development services in the Idaho AAs.

Retail Banking Services

Overall, the bank's delivery systems are readily accessible to residents and businesses throughout the bank's Idaho AAs. The bank operates 23 branches, which include ATMs, and most include a drive-up facility. Most branches offer extended hours. Some of the branches were new prior to this evaluation period, and other branches were acquired during the evaluation period due to bank acquisition and merger activities. The following table shows the geographic distribution of branches and drive-up facilities in Idaho as of 2020.[49]

Geographic Distribution of Branches
Assessment Area(s): State of Idaho

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**3**	**13.0%**	**2**	**3**	**2**	**2**	**0**				
	DTO	0		0	0	0			6	4.6%	2.8%	7.6%
	LS	0		0	0							
Moderate	**Total**	**6**	**26.1%**	**3**	**3**	**6**	**6**	**0**				
	DTO	0		0	0	0			34	26.2%	24.3%	23.3%
	LS	0		0	0							
Middle	**Total**	**9**	**39.1%**	**5**	**2**	**9**	**8**	**0**				
	DTO	0		0	0	0			59	45.4%	50.2%	44.8%
	LS	0		0	0							

[49] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within one mile of their prior location are not shown in the table.

Upper	**Total**	**5**	**21.7%**	**3**	**0**	**5**	**4**	**0**	31	23.8%	22.7%	24.3%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**23**	**100.0%**	**13**	**8**	**22**	**20**	**0**	130	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, the bank has 13.0% and 26.1% of its branches in low- and moderate-income census tracts, respectively. The percentage of the bank's branches in low-income tracts exceeds demographics, as 4.6% of the tracts in the Idaho AAs are low-income tracts. The percentage of the bank's branches in moderate-income tracts is consistent with demographics, as 26.2% of the tracts in the Idaho AAs are moderate-income tracts.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

The bank is a leader in providing community development services. This conclusion is driven by the bank's performance in the full-scope AA. Most of the bank's services benefited the Boise City CSA AA. The bank engaged in community development services in two of its Idaho AAs, as well as in services that benefited a regional or statewide area including the bank's AAs. The table below shows the distribution of community development services by type of activity and AA.

Idaho Community Development Services					
Assessment Area	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize or Stabilize***	***Total***
Boise City CSA	2	33	0	0	35
Coeur d'Alene MSA	0	2	0	1	3
Regional Idaho	0	3	0	0	3
State of Idaho	1	5	0	1	7
Totals	**3**	**43**	**0**	**2**	**48**

Numerous employees provided their financial expertise and time to organizations that support community development initiatives in Idaho, and a few employees provided more than one community development service. The bank's services are focused on organizations that provide essential goods and services to

LMI individuals, including youth, such as financial literacy, independence, and food. Further, the bank provided services to organizations that address homelessness. Bank employees also provided services that helped to revitalize or stabilize moderate-income tracts or a designated disaster area, as well as to promote affordable housing, which is a concern in some of areas of the state. Employees often served in leadership capacities for these organizations, including serving on the board of directors or on a committee or council, in addition to several financial literacy training roles. Overall, the bank's services are very responsive to the community development needs of the areas the bank serves. Based on 2020 FFIEC adjusted census data, 22.4% and 16.9% of households in the Idaho AAs are low- and moderate-income, respectively; 13.9% are below poverty level.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BOISE CITY-MOUNTAIN HOME-ONTARIO, ID-OR CSA

Bank Information. The bank operates 16 full-service branches in the Boise City-Mountain Home-Ontario, ID-OR CSA AA (Boise City CSA AA). All branches have ATMs and most have drive-up facilities. The branches are in Boise (3), Garden City, Nampa (2), Caldwell, Eagle, Emmett, Fruitland, Kuna, Meridian (3), Star, and Mountain Home. During the evaluation period, the bank acquired, relocated, and closed branches. Generally, the bank closed certain branches to consolidate operations after acquisitions, as well as to relocate some branches. By number, the bank has 11.1% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked fourth among 22 FDIC-insured institutions operating in the following Idaho counties: Ada, Canyon, Elmore, Gem, and Payette, with a 7.7% deposit market share and approximately $1.2 billion in deposits. The deposits in these counties represent 8.8% of the bank's overall deposits. The bank competes with various types of financial institutions, including several community, regional, and large national banks as well as credit unions, non-bank mortgage lenders, and online mortgage lenders. Three large national banks' deposits represent 55.6% of deposit market share, with the two largest of those banks holding 44.4% of deposit market share.

Assessment Area Information. The Boise City CSA AA is in southwest Idaho and consists of Ada, Canyon, Gem, Payette, and Elmore counties in Idaho as well as one tract in Malheur County in Oregon, which was added to the AA in 2019. The AA is comprised of a portion of the Boise City, ID MSA and overall, a portion of the Boise City-Mountain Home-Ontario, ID-OR CSA. The AA is adjacent to the bank's Ketchum AA. The Boise City CSA AA is diverse geographically, including rural areas with agricultural land, national forests, or desert land, as well as more urban areas. This AA was added in late-2017 because of the BOTC merger. Due to the timing, this AA was not included in the previous evaluation. Since the BOTC merger, the bank also added additional branches to this AA as a result of additional acquisition activity.

Given the change in the AA, the census tract composition of the AA was different in 2018 than in 2019 and 2020. In 2018, the Boise City CSA AA included 6 low-, 28 moderate-, 42 middle-, and 24 upper-income census tracts. The following Combined Demographics Report provides demographic information, including the census tract composition for 2019 and 2020, for this AA, based on 2020 FFIEC adjusted census data and 2020 D& B data.[50]

[50]The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects OMB revised MSA delineations as applicable.

Combined Demographics Report

2020 Boise City-Mountain Home-Ontario, ID-OR CSA AA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	5.9	4,122	2.4	1,600	38.8	32,978	19.4
Moderate	29	28.7	42,447	24.9	6,610	15.6	31,736	18.7
Middle	42	41.6	81,704	48.0	7,848	9.6	37,119	21.8
Upper	24	23.8	41,875	24.6	1,535	3.7	68,315	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**101**	**100.0**	**170,148**	**100.0**	**17,593**	**10.3**	**170,148**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	9,916	2,306	1.4	23.3	6,412	64.7	1,198	12.1
Moderate	71,271	37,308	22.2	52.3	29,055	40.8	4,908	6.9
Middle	125,197	83,425	49.6	66.6	33,835	27.0	7,937	6.3
Upper	59,693	45,145	26.8	75.6	11,623	19.5	2,925	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**266,077**	**168,184**	**100.0**	**63.2**	**80,925**	**30.4**	**16,968**	**6.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3,761	9.9	3,249	9.2	448	19.4	64	20.3
Moderate	9,394	24.7	8,629	24.4	702	30.3	63	19.9
Middle	15,150	39.8	14,380	40.6	663	28.6	107	33.9
Upper	9,713	25.5	9,129	25.8	502	21.7	82	25.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**38,018**	**100.0**	**35,387**	**100.0**	**2,315**	**100.0**	**316**	**100.0**
Percentage of Total Businesses:				**93.1**		**6.1**		**0.8**

Combined Demographics Report								
2020 Boise City-Mountain Home-Ontario, ID-OR CSA AA								
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	27	2.5	21	2.1	6	10.3	0	0.0
Moderate	237	21.9	219	21.4	17	29.3	1	33.3
Middle	629	58.1	600	58.8	27	46.6	2	66.7
Upper	189	17.5	181	17.7	8	13.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,082**	**100.0**	**1,021**	**100.0**	**58**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**94.4**		**5.4**		**0.3**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Boise City, ID MSA as well as family incomes for the nonmetropolitan areas of Idaho and Oregon for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Boise City, ID MSA					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2018	**$69,600**	0 - $34,799	$34,800 - $55,679	$55,680 - $83,519	$83,520 - & above
2019	**$71,700**	0 - $35,849	$35,850 - $57,359	$57,360 - $86,039	$86,040 - & above
2020	**$74,300**	0 - $37,149	$37,150 - $59,439	$59,440 - $89,159	$89,160 - & above

Borrower Income Levels Nonmetropolitan Areas of Idaho					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	**$55,600**	0 - $27,799	$27,800 - $44,479	$44,480 - $66,719	$66,720 - & above
2019	**$57,100**	0 - $28,549	$28,550 - $45,679	$45,680 - $68,519	$68,520 - & above
2020	**$59,200**	0 - $29,599	$29,600 - $47,359	$47,360 - $71,039	$71,040 - & above

Borrower Income Levels Nonmetropolitan Areas of Oregon					
FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	**$57,500**	0 - $28,749	$28,750 - $45,999	$46,000 - $68,999	$69,000 - & above
2020	**$61,400**	0 - $30,699	$30,700 - $49,119	$49,120 - $73,679	$73,680 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Boise City, ID MSA, which was $61,722 for 2018, 2019, and 2020. For the nonmetropolitan areas of Idaho, this figure was $52,759 for 2018 and $52,867 for 2019 and 2020. For the nonmetropolitan areas of Oregon, this figure was $51,555 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 686,407. Most of the AA population, 51.6.%, is 25 to 64 years of age. The AA includes these percentages of the remaining age groups: 26.9% of individuals aged 17 years and younger, 12.4% of individuals aged 65 years and older, and 9.2% of individuals aged 18 to 24 years. Community contacts indicated that people from out of state have continued to move into the area. The pandemic, which prompted more workers to have the capability to work remotely, contributed to this growth. Most of the population growth in recent years has been in the areas closest to Boise, in Ada County, as well as Canyon County.

Housing Information. According to 2020 FFIEC adjusted census data, this AA has 266,077 housing units: 63.2% are owner-occupied, 30.4% are rental units, and 6.4% are vacant. The median age of the housing stock is 30 years, which is comparable to the statewide median of Idaho (31) and below the statewide median of Oregon (38). The median housing value is $165,275, and the affordability ratio is 30.7, which is similar to the state ratio of 29.2 for Idaho and higher than the state ratio of 21.6 for Oregon. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Community contacts and bank management indicated that affordable housing is a significant concern in the Boise City CSA AA. Affordable housing, including rental housing, is in short supply. The population continues to increase as people move into the area from out of state, which became more pronounced once the pandemic started. Some of these people can buy homes with cash, which can limit the

competition from local residents who cannot do the same. Home prices increased significantly over the evaluation period. Some areas of the AA are more affordable than others, and some residents move to locations further from their workplaces for that reason. Although some towns do not have the infrastructure to support new housing construction, in general, housing construction continues that meets the demand for housing that would generally not be considered affordable for LMI individuals.

The table below shows the housing cost burden in the AA, the MSA, counties comprising the AA, nonmetropolitan areas of Idaho and Oregon, and the states of Idaho and Oregon, for individuals of different income levels. As reflected in the table, individuals in the low-income brackets, as well as some individuals in the moderate-income brackets, for both renter and homeowner categories exceed HUD's 30% cost-burden threshold. The cost burden is more significant for low-income individuals. The overall cost burden for renters and homeowners in the AA varies in how it compares to the state level data.

Boise City-Mountain Home-Ontario, ID-OR CSA AA Housing Cost Burden

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Boise City-Mountain Home-Ontario, ID-OR CSA AA	74%	41%	41%	59%	38%	20%
Ada County, ID	78%	47%	42%	60%	43%	19%
Canyon County, ID	68%	28%	40%	59%	32%	21%
Elmore County, ID	74%	40%	37%	51%	33%	17%
Gem County, ID	65%	27%	36%	69%	46%	26%
Payette County, ID	70%	49%	34%	62%	24%	20%
Malheur County, OR	71%	52%	45%	57%	36%	22%
Boise City, ID MSA	74%	40%	41%	59%	39%	20%
NonMSA Idaho	74%	33%	40%	55%	32%	20%
NonMSA Oregon	74%	49%	42%	64%	38%	23%
Idaho	75%	37%	40%	59%	36%	20%
Oregon	81%	57%	47%	70%	48%	25%

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

General Economic and Business Information. Overall, the economy in the AA has fared quite well during the evaluation period, despite the onset of the pandemic in 2020. Generally, businesses maintained their presence in the AA and no major closures of businesses or large employee layoffs occurred. Non-essential industries, such as hospitality (including restaurants), were impacted by the pandemic due to temporary closures or changes in business models, which caused a rapid spike in unemployment. However, generally, unemployment declined quickly as well due to the brief nature of those changes. Some new businesses have opened in the area. PPP loans helped support businesses in the area during the onset of the pandemic in 2020. In addition, as people have moved into the area and because of the pandemic, the number of workers who work remotely in the area has increased.

The AA has a relatively diverse economy, which varies somewhat depending on location. Boise is the capital of the state and is the most highly populated city in the AA. According to bank management and community contacts, the Boise economy and economy of surrounding smaller communities (such as Meridian, Nampa, Caldwell, and Eagle) is driven by technology, health care, transportation, utilities, construction (residential and commercial), retail and service, education (including Boise State

University), government, food production, and tourism. Some areas also have some agricultural-related economies, which are driven primarily by crops such as corn, wheat, hops, and onions. Some areas of the economy are impacted by the topography of the AA, which includes national forest land and desert land. Outdoor recreation, such as hunting and fishing, is popular, and people also often travel to or through Boise as they make their way to nearby ski areas.

During the evaluation period, the pandemic impacted a variety of things in the area, such as housing prices and availability, and employment. Businesses experienced higher costs, including having to increase wages to get and retain workers. Prior to the onset of the pandemic, the area had a shortage of employees, and this shortage increased once the pandemic started.

The annual average unemployment rate for the AA was generally consistent with that of the state of Idaho and slightly lower than that of the state of Oregon. The following table provides the annual average unemployment rates for the AA, the MSA, counties in the AA, the nonmetropolitan areas of Idaho and Oregon, and the states of Idaho and Oregon. As mentioned, the increases in unemployment rates in 2020 are attributable to the impact of the pandemic. Bank management noted that rates went up fairly quickly in 2020 and also declined relatively fast in 2020.

Boise City-Mountain Home-Ontario, ID-OR CSA AA Unemployment Rates			
Area	**2018**	**2019**	**2020**
Boise City-Mountain Home-Ontario, ID-OR CSA AA	2.75%	2.68%	5.50%
Ada County, ID	2.45%	2.39%	5.39%
Canyon County, ID	3.06%	3.05%	5.87%
Elmore County, ID	3.23%	3.10%	4.84%
Gem County, ID	3.41%	3.14%	5.91%
Payette County, ID	3.54%	3.38%	5.29%
Malheur County, OR	4.43%	4.04%	5.18%
Boise City, ID MSA	2.67%	2.62%	5.57%
NonMSA Idaho	3.05%	3.03%	5.22%
NonMSA Oregon	4.97%	4.65%	7.88%
Idaho	2.81%	2.77%	5.36%
Oregon	4.01%	3.70%	7.58%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOISE CITY-MOUNTAIN HOME-ONTARIO, ID-OR CSA

The bank's Lending Test performance in the Boise City CSA AA is good. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is also good. The bank is a leader in making community development loans. The bank extensively uses flexible loan programs to help meet credit needs in the AA. Examiners assigned the most weight to small business and consumer loans based on the total number volume of loans during the evaluation period, followed by HMDA loans. Examiners did not include the bank's small farm lending in the analysis because agricultural loans are not a major product for this AA based on volume.

Overall, the Investment Test performance in this AA is good. The bank did not make any non-donation investments in the AA, which is adequate given performance context. The bank's level of donations and the responsiveness to community development needs were excellent.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. Additionally, the bank is a leader in providing community development services.

LENDING TEST

The bank's Lending Test performance in the Boise City CSA AA is good.

Lending Activity

Overall, the bank's lending activity reflects good responsiveness to AA credit needs. The bank's market share for HMDA was similar in 2019 and 2020. For HMDA loans, the bank ranked 31st among 393 lenders reporting HMDA loans in 2019 and 45th among 423 lenders in 2020. The bank's market share of HMDA lending averaged 0.5% over both years. The bank ranked 12th among 104 lenders reporting CRA data in 2019 and 17th among 141 lenders reporting CRA data in 2020. The bank's market share of small business loans was 1.7% in 2019 and was higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented 5.8% by number and 4.4% by dollar amount of the bank's total lending. Within the Idaho AAs, the lending activity in the Boise City CSA AA was 75.6% by number and 52.2% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. At the product level, examiners evaluated home purchase, refinance, home improvement, and other purpose LOC loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	3.4	4.2	388	1.7	2.2	1	1.9	4.0	120	0.6	2.2	19.4
Moderate	16	18.0	21.0	2,658	11.9	14.6	7	13.5	19.3	1,764	9.2	13.7	18.7
Middle	18	20.2	26.0	4,082	18.3	23.0	5	9.6	27.0	1,405	7.3	23.7	21.8
Upper	47	52.8	39.9	13,819	61.9	50.4	33	63.5	43.6	14,069	73.1	53.7	40.2
Unknown	5	5.6	8.8	1,366	6.1	9.8	6	11.5	6.1	1,884	9.8	6.7	0.0
Total	89	100.0	100.0	22,313	100.0	100.0	52	100.0	100.0	19,242	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2) Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
Refinance Loans													
Low	6	5.9	6.4	721	3.8	3.8	3	2.2	5.6	415	1.4	3.4	19.4
Moderate	17	16.7	16.2	2,584	13.6	11.9	20	14.9	15.7	3,258	11.2	11.9	18.7
Middle	26	25.5	24.0	3,934	20.7	21.1	29	21.6	22.3	5,080	17.4	20.1	21.8
Upper	45	44.1	38.7	9,898	52.0	45.7	67	50.0	39.6	17,201	58.9	46.3	40.2
Unknown	8	7.8	14.8	1,884	9.9	17.5	15	11.2	16.7	3,259	11.2	18.3	0.0
Total	102	100.0	100.0	19,021	100.0	100.0	134	100.0	100.0	29,213	100.0	100.0	100.0
Home Improvement Loans													
Low	3	5.9	5.1	83	1.8	4.1	4	6.9	5.4	141	1.8	4.6	19.4
Moderate	11	21.6	15.4	762	17.0	12.6	10	17.2	14.9	551	7.0	12.0	18.7
Middle	13	25.5	25.2	1,090	24.3	22.9	6	10.3	25.2	523	6.6	22.3	21.8
Upper	20	39.2	52.2	2,351	52.3	57.9	33	56.9	52.7	6,415	81.6	59.0	40.2
Unknown	4	7.8	2.2	206	4.6	2.5	5	8.6	1.8	235	3.0	2.2	0.0
Total	51	100.0	100.0	4,492	100.0	100.0	58	100.0	100.0	7,865	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	3.9	5.3	1,348	2.4	3.0	9	3.0	5.0	701	1.1	2.9	19.4
Moderate	60	16.7	18.3	6,873	12.1	13.2	46	15.4	16.8	6,594	10.5	12.5	18.7
Middle	80	22.3	24.9	10,256	18.0	22.0	57	19.1	23.8	8,959	14.3	21.4	21.8
Upper	183	51.0	40.3	34,793	61.2	48.7	159	53.2	41.6	40,789	65.1	49.5	40.2
Unknown	22	6.1	11.3	3,626	6.4	13.1	28	9.4	12.7	5,570	8.9	13.6	0.0
Total	359	100.0	100.0	56,896	100.0	100.0	299	100.0	100.0	62,613	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2) Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	2	1.7	5.8	156	1.4	4.6	1	1.9	5.8	25	0.4	4.4	19.4
Moderate	16	13.7	13.8	869	7.9	8.7	9	16.7	13.6	1,021	16.6	10.1	18.7
Middle	23	19.7	22.3	1,150	10.4	16.7	17	31.5	19.9	1,951	31.7	14.5	21.8
Upper	71	60.7	55.7	8,725	78.8	68.2	26	48.1	57.2	3,104	50.5	68.9	40.2
Unknown	5	4.3	2.3	170	1.5	1.8	1	1.9	3.6	50	0.8	2.2	0.0
Total	117	100.0	100.0	11,070	100.0	100.0	54	100.0	100.0	6,151	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2) Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
Other Purpose Closed/Exempt													
Low	0	0.0	8.1	0	0.0	5.1	0	0.0	7.6	0	0.0	3.5	19.4
Moderate	0	0.0	16.9	0	0.0	14.2	0	0.0	17.1	0	0.0	9.3	18.7
Middle	0	0.0	25.5	0	0.0	18.4	0	0.0	23.4	0	0.0	13.5	21.8
Upper	0	0.0	46.0	0	0.0	57.2	0	0.0	48.7	0	0.0	69.1	40.2
Unknown	0	0.0	3.4	0	0.0	5.1	0	0.0	3.2	0	0.0	4.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	10.4	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	19.4
Moderate	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	1	0.7	0.0	18.7
Middle	0	0.0	1.9	0	0.0	3.8	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	0.5	0	0.0	1.1	0	0.0	0.0	0	0.0	0.0	40.2
Unknown	0	0.0	85.8	0	0.0	95.0	1	100.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	142	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics and comparable to aggregate lenders. For those same years, the bank's overall lending to moderate-income borrowers was generally comparable to demographics and aggregate lenders. At the product level, for moderate-income borrowers, the bank's 2019 home improvement lending exceeded aggregate lenders' activity and 2020 home purchase lending was below aggregate lenders' activity. Based on 2019 and 2020 FFIEC adjusted census data, 19.4% of the families in the AA are low income and 18.7% are moderate income. The bank's lending to LMI borrowers is reasonable given the competitive market for HMDA loans as well as the affordability factors discussed below. The bank competes with various types of institutions for these loans in the AA, including mortgage companies, credit unions, regional banks, and large national banks.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $74,300 for the Boise City, ID MSA, an individual with the highest income in the low-income bracket ($37,149) could afford a $111,447 home. Using the same assumption, a borrower with the highest income in the moderate-income bracket ($59,439) could afford a $178,317 home. The price for a home to be considered affordable for LMI borrowers in the nonmetropolitan areas of the AA is somewhat lower than these previously mentioned prices due to lower median family incomes in those areas. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $165,275. This data suggests that homeownership would not be affordable for many LMI borrowers. Community contacts and bank management noted that housing prices increased significantly over the evaluation period, impacting affordability. As people moved into the area, especially in 2020, housing prices increased and competition with cash offers was present. Bank management also indicated that starter homes can be hard to find in the area. While there has been new housing construction in the AA, the homes are higher-priced homes or multifamily complexes.

In this AA, the bank made extensive use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in the Fannie Mae HomeReady and Idaho Housing and Finance

Association programs, which help LMI borrowers (including closing cost and downpayment assistance) achieve homeownership, and also made FHA and VA loans. During the evaluation period, the bank made loans through all of these programs totaling more than $8.3 million. Given the affordability issues in the AA, the bank's participation in these programs is noteworthy. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Lastly, the bank's 2018 HMDA lending performance was generally consistent with the bank's 2019 and 2020 HMDA lending performance.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020. Aggregate lending data is not available for consumer lending.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Boise City-Mountain Home-Ontario, ID-OR CSA

	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	2	1.2%	23	0.6%	17	10.4%	242	6.1%
Moderate	53	32.3%	1,247	31.5%	23	14.0%	425	10.7%
Low/Moderate Total	55	33.5%	1,270	32.1%	40	24.4%	667	16.8%
Middle	80	48.8%	1,745	44.1%	47	28.7%	1,023	25.8%
Upper	29	17.7%	944	23.8%	74	45.1%	2,221	56.1%
Unknown	0	0.0%	0	0.0%	3	1.8%	48	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	164	100.0%	3,959	100.0%	164	100.0%	3,959	100.0%
	Other - Secured							
Low	3	2.0%	54	1.3%	5	3.4%	98	2.3%
Moderate	26	17.7%	604	14.3%	22	15.0%	522	12.4%
Low/Moderate Total	29	19.7%	658	15.6%	27	18.4%	620	14.7%
Middle	77	52.4%	2,154	51.1%	43	29.3%	1,157	27.5%
Upper	41	27.9%	1,400	33.2%	77	52.4%	2,435	57.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	147	100.0%	4,212	100.0%	147	100.0%	4,212	100.0%
	Other - Unsecured							
Low	8	2.9%	86	1.9%	43	15.8%	315	6.9%
Moderate	71	26.0%	975	21.5%	71	26.0%	1,050	23.1%
Low/Moderate Total	79	28.9%	1,061	23.3%	114	41.8%	1,365	30.0%
Middle	141	51.6%	2,168	47.7%	59	21.6%	711	15.6%
Upper	53	19.4%	1,316	29.0%	91	33.3%	2,371	52.2%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Boise City-Mountain Home-Ontario, ID-OR CSA								
Unknown	0	0.0%	0	0.0%	9	3.3%	98	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	273	100.0%	4,545	100.0%	273	100.0%	4,545	100.0%
	Consumer Loan Totals							
Low	13	2.2%	163	1.3%	65	11.1%	655	5.2%
Moderate	150	25.7%	2,826	22.2%	116	19.9%	1,997	15.7%
Low/Moderate Total	163	27.9%	2,989	23.5%	181	31.0%	2,652	20.9%
Middle	298	51.0%	6,067	47.7%	149	25.5%	2,891	22.7%
Upper	123	21.1%	3,660	28.8%	242	41.4%	7,027	55.3%
Unknown	0	0.0%	0	0.0%	12	2.1%	146	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	584	100.0%	12,716	100.0%	584	100.0%	12,716	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Boise City-Mountain Home-Ontario, ID-OR CSA								
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Motor Vehicle							
Low	9	4.2%	176	3.7%	22	10.4%	320	6.7%
Moderate	57	26.9%	1,384	29.0%	40	18.9%	850	17.8%
Low/Moderate Total	66	31.1%	1,560	32.7%	62	29.2%	1,170	24.5%
Middle	117	55.2%	2,425	50.8%	57	26.9%	1,129	23.6%
Upper	29	13.7%	792	16.6%	93	43.9%	2,478	51.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	212	100.0%	4,777	100.0%	212	100.0%	4,777	100.0%
	Other - Secured							
Low	1	0.6%	40	0.7%	9	5.7%	153	2.8%
Moderate	35	22.3%	954	17.4%	24	15.3%	725	13.2%
Low/Moderate Total	36	22.9%	994	18.1%	33	21.0%	878	16.0%
Middle	81	51.6%	3,036	55.4%	37	23.6%	948	17.3%
Upper	40	25.5%	1,455	26.5%	84	53.5%	3,602	65.7%
Unknown	0	0.0%	0	0.0%	3	1.9%	57	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	157	100.0%	5,485	100.0%	157	100.0%	5,485	100.0%
	Other - Unsecured							
Low	10	3.5%	237	4.5%	42	14.9%	414	7.9%
Moderate	70	24.8%	984	18.7%	49	17.4%	677	12.8%
Low/Moderate Total	80	28.4%	1,221	23.2%	91	32.3%	1,091	20.7%
Middle	149	52.8%	2,262	42.9%	63	22.3%	1,034	19.6%
Upper	53	18.8%	1,790	33.9%	120	42.6%	3,003	57.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Boise City-Mountain Home-Ontario, ID-OR CSA								
Unknown	0	0.0%	0	0.0%	8	2.8%	145	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	282	100.0%	5,273	100.0%	282	100.0%	5,273	100.0%
	Consumer Loan Totals							
Low	20	3.1%	453	2.9%	73	11.2%	887	5.7%
Moderate	162	24.9%	3,322	21.4%	113	17.4%	2,252	14.5%
Low/Moderate Total	182	28.0%	3,775	24.3%	186	28.6%	3,139	20.2%
Middle	347	53.3%	7,723	49.7%	157	24.1%	3,111	20.0%
Upper	122	18.7%	4,037	26.0%	297	45.6%	9,083	58.5%
Unknown	0	0.0%	0	0.0%	11	1.7%	202	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	651	100.0%	15,535	100.0%	651	100.0%	15,535	100.0%

For 2019 and 2020, the bank's overall lending to low-income borrowers was below demographics. For 2019, the bank's overall lending to moderate-income borrowers slightly exceeded demographics. In 2020, the bank's overall lending to moderate-income borrowers was comparable to demographics. According to 2019 and 2020 FFIEC adjusted census data, 22.9% of the households in the AA are low income and 16.7% are moderate income. By product, the bank's other-unsecured lending to moderate-income borrowers exceeded demographics in 2019. The bank's borrower distribution of loans is reasonable given the strong banking competition in the AA. Consumers have numerous banking options.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2019 and 2020, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
	Bank And Aggregate Loans By Year												**Total Businesses %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	139	49.1	49.3	12,312	43.4	34.2	108	9.7	44.6	9,278	10.5	26.0	93.1
Over $1 Million	132	46.6		15,010	52.9		106	9.6		16,276	18.5		6.1
Revenue Unknown	12	4.2		1,029	3.6		895	80.7		62,625	71.0		0.8
Total	283	100.0		28,351	100.0		1,109	100.0		88,179	100.0		100.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
By Loan Size													
$100,000 or Less	222	78.4	92.7	8,021	28.3	36.7	865	78.0	86.7	27,268	30.9	31.5	
$100,001 - $250,000	32	11.3	3.6	5,447	19.2	15.4	165	14.9	7.4	25,892	29.4	19.6	
$250,001 - $1 Million	29	10.2	3.6	14,883	52.5	47.9	79	7.1	5.9	35,019	39.7	48.9	
Total	283	100.0	100.0	28,351	100.0	100.0	1,109	100.0	100.0	88,179	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	117	84.2		3,614	29.4		86	79.6		2,543	27.4		
$100,001 - $250,000	10	7.2		1,833	14.9		9	8.3		1,584	17.1		
$250,001 - $1 Million	12	8.6		6,865	55.8		13	12.0		5,151	55.5		
Total	139	100.0		12,312	100.0		108	100.0		9,278	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses was comparable to aggregate lenders' activity in 2019 and was below aggregate lenders in 2020. For both years, the bank and aggregate lenders were below demographic data. According to 2019 and 2020 D&B data, 92.6% and 93.1% of businesses had gross annual revenues of $1 million or less, respectively. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less but made most of its loans in those smaller amounts. In 2019 and 2020, the bank made 84.2% and 79.6%, respectively, of its small business loans to small entities for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with numerous financial institutions for small business loans, including regional banks and large national banks, including national credit card lenders.

The bank's lending to businesses with unknown revenues increased significantly from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of applicants. In 2020, the bank made extensive use of this program; these loans were designed to help businesses keep their workforces employed during the coronavirus pandemic. The bank originated over 860 PPP loans (in amounts of $1.0 million or less) for over $60.0 million in this AA, of which more than half were for amounts of $50,000 or less. These loans amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

Lastly, the bank's 2018 small business lending was generally consistent with the bank's 2019 small business lending.

Geographic Distribution

The bank's geographic distribution of loans reflects good dispersion among census tracts of different income levels and does not reveal any unexplained gaps. The AA has six low-income and 29 moderate-income census tracts. In addition, the AA includes 42 middle-income tracts, which comprise 41.6% of the AA's tracts, as well as 24 upper-income tracts.

Residential Real Estate. The geographic distribution of residential real estate loans is good. The tables below display the distribution of the bank's 2019 and 2020 HMDA loans by census tract income level. The tables also include aggregate lending data for each year and demographics.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	2.2	2.0	569	2.6	1.5	0	0.0	1.7	0	0.0	1.3	1.4
Moderate	23	25.8	21.4	3,992	17.9	15.7	7	13.5	20.6	1,587	8.2	15.7	22.2
Middle	33	37.1	48.8	8,800	39.4	46.7	25	48.1	49.9	7,763	40.3	47.9	49.6
Upper	31	34.8	27.8	8,952	40.1	36.2	20	38.5	27.8	9,892	51.4	35.1	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	22,313	100.0	100.0	52	100.0	100.0	19,242	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.0	0	0.0	0.8	1	0.7	1.0	162	0.6	0.8	1.4
Moderate	24	23.5	18.0	3,382	17.8	13.9	25	18.7	16.3	3,809	13.0	12.8	22.2
Middle	50	49.0	50.2	8,870	46.6	47.9	69	51.5	49.6	15,164	51.9	47.0	49.6
Upper	28	27.5	30.7	6,769	35.6	37.4	39	29.1	33.1	10,078	34.5	39.4	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	102	100.0	100.0	19,021	100.0	100.0	134	100.0	100.0	29,213	100.0	100.0	100.0
Home Improvement Loans													
Low	1	2.0	1.3	25	0.6	1.3	1	1.7	1.1	40	0.5	1.0	1.4
Moderate	12	23.5	18.7	891	19.8	16.5	9	15.5	17.2	458	5.8	13.7	22.2
Middle	27	52.9	47.9	2,214	49.3	44.0	22	37.9	47.0	2,380	30.3	42.0	49.6
Upper	11	21.6	32.1	1,362	30.3	38.2	26	44.8	34.7	4,987	63.4	43.3	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	4,492	100.0	100.0	58	100.0	100.0	7,865	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	2	66.7	24.1	1,706	64.6	6.7	0	0.0	16.2	0	0.0	5.4	14.5
Moderate	0	0.0	32.8	0	0.0	20.4	1	25.0	25.0	225	1.3	27.2	36.9
Middle	0	0.0	25.9	0	0.0	39.0	2	50.0	42.6	6,185	35.1	43.6	32.6
Upper	1	33.3	17.2	933	35.4	33.8	1	25.0	16.2	11,212	63.6	23.8	15.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	2,639	100.0	100.0	4	100.0	100.0	17,622	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA

	Total Home Mortgage Loans												Owner Occupied Units %
Low	5	1.4	1.5	2,300	3.9	1.3	4	1.3	1.2	444	0.6	1.1	1.4
Moderate	85	23.5	19.6	10,650	17.9	15.0	50	16.5	17.8	6,681	8.3	14.2	22.2
Middle	183	50.6	49.4	26,300	44.2	46.9	145	47.9	49.5	34,645	43.2	47.1	49.6
Upper	89	24.6	29.6	20,285	34.1	36.9	104	34.3	31.4	38,465	47.9	37.6	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	362	100.0	100.0	59,535	100.0	100.0	303	100.0	100.0	80,235	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2)
Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.9	0	0.0	0.8	1	1.9	1.4	100	1.6	1.7	1.4
Moderate	26	22.2	13.8	2,385	21.5	10.6	8	14.8	13.5	602	9.8	9.1	22.2
Middle	73	62.4	48.0	6,416	58.0	40.8	27	50.0	45.2	3,153	51.3	39.6	49.6
Upper	18	15.4	37.2	2,269	20.5	47.8	18	33.3	39.9	2,296	37.3	49.7	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	117	100.0	100.0	11,070	100.0	100.0	54	100.0	100.0	6,151	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.7	0	0.0	1.4	0	0.0	1.3	0	0.0	9.9	1.4
Moderate	0	0.0	17.2	0	0.0	13.0	0	0.0	16.5	0	0.0	10.7	22.2
Middle	0	0.0	50.8	0	0.0	44.9	0	0.0	45.3	0	0.0	30.6	49.6
Upper	0	0.0	31.4	0	0.0	40.7	0	0.0	37.0	0	0.0	48.8	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.3	0	0.0	1.2	1	100.0	0.9	142	100.0	0.6	1.4
Moderate	0	0.0	28.3	0	0.0	18.0	0	0.0	20.2	0	0.0	16.0	22.2
Middle	0	0.0	49.1	0	0.0	51.9	0	0.0	58.0	0	0.0	56.7	49.6
Upper	0	0.0	19.3	0	0.0	28.9	0	0.0	20.9	0	0.0	26.7	26.8

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2) Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	142	100.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

In 2019 and 2020, the bank made 1.4% and 1.3% of its HMDA loans, respectively, in the low-income tracts. The bank's lending in the low-income tracts is comparable to the tracts' demographics that show only 1.4% of the AA's owner-occupied units and 2.4% of AA families are in the tracts. According to 2020 FFIEC adjusted census data, 64.7% of housing units are rentals and 12.1% are vacant in the low-income tracts. The bank's performance is comparable to aggregate lenders' performance, who reported 1.5% and 1.2% of HMDA loans in 2019 and 2020, respectively, in the low-income tracts. Overall, the bank did not make HMDA loans in two low-income census tracts in 2019 or 2020. The bank's lack of loans in these tracts is reasonable given tract demographics that show rentals comprise a majority of the tracts' housing, and strong banking competition in the AA.

In those same years, the bank extended HMDA loans in all but three moderate-income census tracts in the AA. The bank made 23.5% and 16.5% of its HMDA loans in 2019 and 2020, respectively, in the moderate-income tracts. In 2019, the bank's lending in the moderate-income tracts was comparable to the tracts' percentage of the AA's owner-occupied units (22.2%) and the percentage of AA families (25.0%) located in the tracts. According to 2020 FFIEC adjusted census data, 40.8% of housing units are rentals and 6.9% of housing units are vacant in the moderate-income tracts. The bank's performance in 2019 was slightly above aggregate lenders' performance, who reported 19.6% of HMDA loans in the moderate-income tracts. In 2020, the bank's performance was comparable to aggregate lenders' performance, who reported 17.8% of HMDA loans in the moderate-income tracts. The lack of loans in three moderate-income tracts, as well as two middle-income tracts and one upper-income tract, is reasonable. One moderate-income tract is an Air Force base and lacks owner-occupied housing. The two other moderate-income tracts have mostly rental housing. In addition, there is strong competition for HMDA loans throughout the AA. Overall, the bank's lending in the low- and moderate-income tracts is reasonable given the demographics and composition of the tracts, aggregate lenders' performance, and the competitive banking environment.

Lastly, the bank's 2018 HMDA lending performance was generally consistent with the bank's 2019 and 2020 HMDA lending performance.

Consumer. The geographic distribution of consumer loans is good. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

In 2019 and 2020, the bank's overall lending in the low-income tracts was 2.2% and 3.1%, respectively, which is comparable to demographics. In 2019 and 2020, the bank's overall lending in the moderate-income tracts was 25.7% and 24.9%, respectively, which is also comparable to demographics. By product level, the bank's lending in the moderate-income tracts exceeded demographics for motor vehicle loans for 2019 and was below demographics for secured loans for 2019 and 2020. Adjusted FFIEC census data indicates that 3.5% of households reside in the low-income tracts and 26.6% of households reside in the moderate-income tracts of the AA. The bank's lending in the LMI tracts is reasonable given the demographics and other performance context. Consumers that seek credit have numerous financial

institutions in the AA that can provide consumer loans, including credit unions. The bank made consumer loans to borrowers in all low- and moderate-income census tracts, as well as all other census tracts, in the AA during 2019 and 2020.

Lastly, the bank's 2018 consumer lending performance was generally consistent with the bank's 2019 and 2020 consumer lending performance.

Small Business. The geographic distribution of small business loans is good. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract, as well as aggregate lending data.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Boise City-Mountain Home-Ontario, ID-OR CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	34	12.0	8.6	6,637	23.4	13.2	138	12.4	10.2	14,428	16.4	14.4	9.9
Moderate	75	26.5	22.2	6,511	23.0	24.0	293	26.4	23.2	26,763	30.4	25.7	24.7
Middle	121	42.8	39.0	8,998	31.7	33.6	453	40.8	37.6	30,534	34.6	30.5	39.8
Upper	53	18.7	28.6	6,206	21.9	28.0	225	20.3	28.1	16,454	18.7	28.7	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	1.2	0	0.0	0.9	0	0.0	0.7	
Total	283	100.0	100.0	28,351	100.0	100.0	1,109	100.0	100.0	88,179	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's small business lending in the low-income tracts was comparable to demographics in 2019 and 2020. The bank's small business lending in the low-income tracts slightly exceeded aggregate lenders' performance in 2019 and was comparable to aggregate lenders' performance in 2020. According to D&B data, only 9.9% of businesses in 2019 and 10.0% in 2020 were in the low-income tracts.

In 2019 and 2020, the bank's small business lending slightly exceeded aggregate lenders' lending and was comparable to demographics in the moderate-income tracts. According to D&B data, only 24.8% of businesses in 2019 and 24.7 % in 2020 were in the moderate-income tracts. The bank's performance in the low- and moderate-income tracts is good given the comparison to demographics and aggregate data, as well as the presence of strong banking competition in the AA. In 2019 and 2020, the bank made small business loans in all low- and moderate-income census tracts, as well as the other tracts except one moderate-income tract and one middle-income tract. The bank's lack of lending in these tracts is reasonable given that the moderate-income tract is the Air Force base and the middle-income tract is quite rural.

Lastly, the bank's 2018 small business lending performance was generally consistent with the bank's 2019 small business lending performance.

Community Development Loans

Community Development Loans in the Boise City CSA AA		
Purpose	**#**	***$***
Affordable Housing	2	3,075,479
Economic Development	2	6,230,961
Total	**4**	9,306,440

Given the bank's presence, the bank is a leader in making community development loans in the Boise City CSA AA. As shown in the table at right, the bank made four community development loans totaling $9.3 million. Most the bank's community development loans by dollar promoted economic development. Specifically, the bank's loans supported the creation of LMI jobs in this AA through the use of the SBA 504 loan program. The remaining loans supported affordable housing in the AA, which was identified as a need by community contacts and bank management. Both affordable housing loans financed multifamily housing; however, one loan supported the construction of 36 new units, which is impactful. Bank management indicated that requests for community development-purpose loans are limited and competition for those loans is strong.

INVESTMENT TEST

The bank made an overall significant level of qualified investments, including donations, in the Boise City CSA AA. The bank did not make any non-donation investments in this AA during the evaluation period, which is adequate given performance context. Bank management noted that opportunities are limited. The bank does not hold any prior-period investments in this AA.

Qualified Investment Donations in the Boise City CSA AA		
Purpose	**#**	***$***
Affordable Housing	25	122,977
Community Service	216	254,950
Total	**241**	**377,927**

The bank made an excellent level of qualified investments in the form of donations as shown in the table at right. The majority of the bank's donations ($254,950) focused on community services targeted to LMI individuals and helped local organizations provide critical services and resources to those in need, such as youth programs, job training, emergency housing, supplies for basic needs, and food. This figure includes larger dollar amount donations that helped to support basic needs related to food accessibility, as well as helped to provide access to child care in the AA, during the pandemic. The bank also made a large dollar amount of donations to organizations that support affordable housing. The donations were very responsive to the AA needs during the pandemic and the evaluation period.

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and services do not vary in a way that inconveniences particular individuals or areas. The bank is a leader in providing community development services.

Retail Services

Delivery systems are readily accessible in the bank's AA. The bank's services and hours do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates 16 branches, which include ATMs, and most include a drive-up facility. Most branches offer extended hours. The branches are in Boise (3), Garden City, Nampa (2), Caldwell, Eagle, Emmett, Fruitland, Kuna, Meridian (3), Star, and Mountain Home. In 2020, the bank's typical operating hours may have been impacted by

the pandemic. Three branches are in low-income census tracts, and five branches are in moderate-income census tracts. During the evaluation period, the bank acquired branches, closed branches in low-, moderate-, and middle-income census tracts, and relocated branches. Generally, the bank consolidated operations where branches were newly acquired and relocated some branches into new offices.[51] While the changes did impact low- and moderate-income census tracts, the closed branches were in close proximity to existing offices and didn't adversely affect operations. Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

The following table shows the geographic distribution of branches in this AA.

Geographic Distribution of Branches
Assessment Area(s): Boise City-Mountain Home-Ontario, ID-OR CSA

Tract Income Levels		BRANCHES							DEMOGRAPHICS			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**3**	**18.8%**	**2**	**3**	**2**	**2**	**0**	6	5.9%	3.5%	9.7%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	**Total**	**5**	**31.3%**	**2**	**2**	**5**	**5**	**0**	29	28.7%	26.6%	24.6%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	**Total**	**4**	**25.0%**	**0**	**1**	**4**	**4**	**0**	42	41.6%	47.1%	40.4%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	**Total**	**4**	**25.0%**	**2**	**0**	**4**	**4**	**0**	24	23.8%	22.8%	25.3%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**16**	**100.0%**	**6**	**6**	**15**	**15**	**0**	101	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

[51] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within one mile of their prior location are not shown in the table. In addition, the two Boise offices closed in the low-income tract were part of a move to the newly constructed location at 1290 West Myrtle Street.

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank is a leader in providing community development services in this AA. The table to the right shows the service activity and purpose category during the evaluation period. During the evaluation period, 22 bank employees provided 35 community development services to 15 organizations. The bank's community development services focused on nonprofit organizations that support essential services for LMI individuals (including youth), such as financial education, emergency housing, and job skills and placement. Bank employees also provided services to two affordable housing organizations. Some employees served as instructors, and others served as board and committee members for organizations. The bank's services were very responsive to the needs of LMI individuals in the AA.

Community Development Services in the Boise City CSA AA	
Purpose	**#**
Affordable Housing	2
Community Services	33
Total	**35**

METROPOLITAN AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COEUR D'ALENE, IDAHO MSA, ASSESSMENT AREA

The bank added this AA since the previous examination because of a bank acquisition in 2018. The AA includes the entirety of Kootenai County, in the northern portion of the state. The AA is adjacent to the Spokane-Spokane Valley MSA AA in Washington and includes a portion of the Coeur d'Alene Reservation. The bank acquired the first three branches in this AA in November 2018 and subsequently acquired an additional five branches in April 2019. The bank closed two branches in June 2019. One of the bank's remaining five offices in this AA is in a moderate-income tract.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COEUR D'ALENE ASSESSMENT AREA

Examiners determined the bank's lending[52] test and investment test performance in this AA is consistent with the performance of the full-scope metropolitan AA. The bank's service test performance is below the performance of the full-scope metropolitan AA due to the low level of community development services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF IDAHO

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development lending and qualified investments for each AA. The Idaho state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AA, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review Idaho MSA AA			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Coeur d'Alene MSA	Consistent	Consistent	Below

[52] Examiners did not include the bank's small farm loans in the analysis because they are not a major business line for this AA.

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KETCHUM, IDAHO ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Blaine County, in the south-central portion of the state. This AA is adjacent to the northern edge of the Boise City CSA AA. The bank added this AA since the previous examination because of a bank acquisition in 2019. The bank acquired the branch through that acquisition. The bank did not open or close any other branches in this AA during the evaluation period. There are no low- or moderate-income tracts in this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KETCHUM ASSESSMENT AREA

Examiners determined the bank's lending test[53] performance in this AA is consistent with the overall state rating. The bank's investment test performance in this AA is below the performance of the state due to a low level of qualified investments. The bank's service performance is also below the performance of the state, due to a lack of community development services and accessibility of delivery systems. The bank's branch is located in an upper-income tract, which is reasonable given the AA is comprised of one middle-income and three upper-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF IDAHO

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Idaho state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AA, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Idaho AA			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Ketchum	Consistent	Below	Below

[53] Examiners did not include the bank's HMDA, small farm, or consumer loans in the analysis because they are not major business lines for this AA.

WASHINGTON

CRA RATING FOR Washington: Outstanding
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

Major factors supporting the rating include the following:

- The bank's lending activity in the Washington AAs shows good responsiveness to local credit needs.
- Overall, the lending to businesses of different sizes and to LMI borrowers is good.
- Overall, the geographic distribution of loans throughout the AAs is good.
- The bank is a leader in making community development loans.
- Overall, the bank makes use of flexible loan programs (notably PPP lending), in its Washington branches.
- The bank has an excellent level of qualified investments, including donations, which exhibit excellent responsiveness to credit and community development needs.
- Bank retail services are generally readily accessible to businesses and residents throughout the AAs. The bank also is a leader overall in providing community development services in its Washington AAs.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Washington is generally consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Spokane-Spokane Valley, WA MSA AA.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Seattle-Bellevue-Kent MD, Kennewick-Richland MSA, Bingen, Colfax, Ephrata, and Raymond-Westport AAs in Washington. Examiners evaluated whether the bank's performance in the limited scope AAs was consistent with its performance in the full-scope AA. The limited-scope MSA/MD AAs are compared against the metropolitan full-scope AA. Similarly, nonmetropolitan limited-scope AAs are compared with the state performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WASHINGTON

Assessment Area Information. The bank had seven AAs in Washington during the evaluation period. All of these AAs are new since the previous evaluation because of bank acquisitions in 2017 and 2018.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranks 31st among the 76 FDIC-insured institutions in Washington, with 0.3% of the state's deposits. The bank has $623.4 million in deposits in its Washington AAs, which represent 4.7% of the bank's total deposits. Three large national banks each have over 10.0% deposit market share, with the leader having 20.4%. Credit unions are not captured in the market share report, and bank management indicated that in the Spokane market for example, credit unions continue to make up a growing, significant percentage of the overall market share.

The bank operates in a competitive environment and most AAs also have several large national and regional banks.

Based on 2020 FFIEC adjusted census data, the Washington AAs include 348 census tracts: 16 low-, 91 moderate-, 169 middle-, 66 upper-, and six unknown-income census tracts.[54] One of the unknown-income tracts is in the Spokane-Spokane Valley MSA AA; a community college and the Washington National Guard are located in this tract. One unknown-income tract is in the Kennewick-Richland MSA AA; the Hanford Reach National Monument is in this general area. Two unknown-income tracts, which are also designated as water tracts (Puget Sound area), are in the Seattle-Bellevue-Kent MD AA. The remaining two unknown-income tracts, also designated as water tracts (Pacific coast), are in the Raymond-Westport AA. As of 2020, 34 census tracts in nonmetropolitan areas are classified as distressed. In 2019 and 2018, respectively, 32 and 20 census tracts in nonmetropolitan areas were classified as distressed.

Several of the Washington AAs include American Indian reservations. The Tulalip Indian Reservation is located in western Snohomish County (Seattle-Bellevue-Kent MD AA). A small portion of tribal trust land of the Kalispel Reservation is located in west-central Spokane County (Spokane-Spokane Valley MSA AA). The Quinault Indian Reservation and the Chehalis Indian Reservation are primarily located in Grays Harbor County (part of the Raymond-Westport AA), in the northwestern corner along the Pacific coast and in the southeastern corner, respectively. The Shoalwater Bay Indian Reservation is located in northwestern Pacific County (part of the Raymond-Westport AA), near the coast. The Yakama Reservation extends along the northern edge of Klickitat County (Bingen AA), and also includes numerous small parcels throughout the county.

Population. According to 2020 FFIEC adjusted census data, the total population of the AAs in Washington is 1,668,141, which represents 23.9% of the state's population (6,985,464). The data also shows that 73.0% of families reside in middle- and upper-income census tracts and that 12.8% of households are below the poverty level.

General Economic and Housing Information. Economic conditions in the Washington AAs varied by region and all experienced the effects of the pandemic, but overall, bank management and community contacts indicated that markets were able to recover. Economic diversity in many of the Washington AAs and the operation of several significant companies in certain AAs (such as The Boeing Company, Microsoft Corporation, and Amazon.com Inc. in the Seattle area) provide stability. Generally, primary industries include aerospace manufacturing, military, higher education, tourism (due to the abundance of state parks, rivers, lakes, and mountains), shipping, information technology, agriculture, and energy. Local government, tribal government, and school districts are often major employers as well. Primary employers in coastal markets also include seafood processing and wood/paper manufacturing. Coastal communities have benefited from the influx of travelers from surrounding states during the pandemic. Fruit packing is an important industry in southcentral Washington. Economic conditions, including the agricultural economy, in Spokane were strong overall despite the pandemic. The annual average statewide unemployment rate for Washington was 4.4% in 2018, 4.3% in 2019, and 8.5% in 2020; these figures were slightly higher than the national annual unemployment rate for the same periods of 3.9%, 3.7%, and 8.1%.

The housing market in Washington varies by region. Significant affordable housing concerns are present in some markets (Spokane and Seattle). A community contact familiar with the Spokane area indicated

[54] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

that the pandemic exacerbated longstanding homelessness, living in poverty, and affordable housing issues.

According to 2020 FFIEC adjusted census data, 58.6% of the housing in the Washington AAs was owner-occupied, 32.2% was rental, and 9.3% was vacant. The median housing value was $226,646 for Washington AAs; the lowest was $156,200 in Pacific County and the highest was $293,000 in Snohomish County. The median age of housing stock was the lowest in Snohomish County at 29 and the highest at 42 in Grays Harbor County.

Numerous financial institutions are in Washington. Competition for deposits, loans, and community development activities is strong.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

Examiners based the bank's Washington evaluation on full-scope review of the Spokane-Spokane Valley MSA AA and limited-scope reviews of the remaining Washington AAs. A detailed discussion of the bank's performance in the full scope AA and a shorter discussion of the limited-review AAs follow this section. For the limited-scope AAs, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Washington is outstanding based on the bank's performance under the Lending, Investment, and Service Tests.[55] The ratings below primarily reflect the bank's performance in the full-scope AA.

The Lending Test rating is high satisfactory. The bank's lending activity reflects good responsiveness to credit needs throughout the Washington AAs. Overall, the distribution of HMDA, small business, and consumer loans by income and revenue size of borrowers is good. Overall, the geographic distribution of loans is good. The bank is a leader in providing community development loans. The bank used a flexible loan program (PPP) for small businesses in all Washington AAs to help meet credit needs.

The Investment Test rating is outstanding. The bank made an excellent level of qualified investments that show excellent responsiveness to credit and community development needs.

The Service Test rating is outstanding. Overall, delivery systems are readily accessible throughout the Washington AAs as well as to LMI individuals. The bank is a leader overall in providing community development services.

LENDING TEST

The Lending Test rating is high satisfactory for Washington.

[55] Examiners only reviewed the bank's 2019 and 2020 loan data and community development activities for all AAs except the Seattle-Bellevue-Kent MD and the Raymond-Westport AAs, due to timing of a bank acquisition (late 2018). For the Seattle-Bellevue-Kent MD and the Raymond-Westport AAs, examiners reviewed three years of loan data and community development activities, unless otherwise noted.

Lending Activity

The bank's lending levels reflect good responsiveness to credit needs in its Washington AAs. The table below shows the bank's lending in its Washington AAs by product type for the three-year evaluation period.

Summary of Lending Activity in the Washington Assessment Areas				
Loan Type	*2018 – 2020*			
	#	*%*	*$(000)*	*%*
HMDA-reportable	619	27.2%	260,816	62.0%
Small Business-reportable	1,072	47.2%	117,784	28.0%
Small Farm-reportable	220	9.7%	33,656	8.0%
Consumer-optional reportable	362	15.9%	8,544	2.0%
Total Loans	2,273	100.0%	420,800	100.0%

The Washington AAs account for 2.9% by number and 5.3% by amount of the bank's lending activity during the evaluation period. Small business lending activity significantly increased from 2019 to 2020, due to the bank's PPP lending. In addition, HMDA lending also increased significantly from 2019 to 2020, due to the refinance boom according to bank management.

The bank was typically not among the leading lenders for small business, small farm, and HMDA loans, with a few exceptions involving small farm and small business lending. Specifically, the bank was consistently the leading small farm lender in the Spokane-Spokane Valley MSA AA and was among the top five small farm lenders in the Colfax AA. Additionally, the bank was among the top 10 small farm lenders in the Ephrata AA each year.

The bank uses flexible and/or innovative lending programs, notably PPP loans for businesses. Refer to the Innovative and Flexible Lending Practices in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good. The bank extends loans to low- and moderate-income borrowers and to small businesses throughout the Washington AAs. In addition, the geographic distribution and dispersion of loans is good and does not reveal any unexplained gaps or patterns.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Spokane-Spokane Valley MSA AA. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope AAs.

During the evaluation period, the bank made loans through flexible loan programs totaling over $65.2 million in its Washington AAs (including PPP loans and certain mortgage loan programs); these loans were included in the overall volume of loans evaluated. Refer to the Institution and AA sections for specific information.

Community Development Loans

Washington Community Development Loans		
Purpose	**#**	***$***
Affordable Housing	3	9,745,357
Economic Development	1	25,000
Revitalize or Stabilize	4	29,596,250
Total	**8**	39,366,607

The bank is a leader in making community development loans in the Washington AAs. This conclusion primarily reflects the bank's performance in the full-scope AA, but also recognizes community development lending in one other Washington AA. As shown in the table at the right, the bank originated eight community development loans totaling $39.4 million. Community development loans were not made in all AAs, which is reasonable given the limited lending activity and deposit market share in many of the bank's Washington AAs. All community development loans benefited the Spokane-Spokane Valley MSA AA, with the exception of one loan for $2.0 million, which was noteworthy, that benefited the Seattle-Bellevue-Kent AA.

Most community development loan dollars (75.2%) supported revitalization and stabilization efforts in low- and moderate-income tracts, primarily multifamily housing development, but one loan was also for the construction of a drug rehabilitation center. Overall, the level of community development lending is highly responsive to the needs of the AAs.

Given this responsiveness, examiners can also consider any qualified community development loans benefitting geographies outside the bank's AAs. The bank originated two loans totaling $33.4 million that were outside the Washington AAs. These loans promoted affordable housing. The table above does not include these loans.

INVESTMENT TEST

The bank's Investment Test rating is outstanding for Washington. The bank has an excellent level of qualified investments that show excellent responsiveness to credit and community development needs.

During the evaluation period, the bank made an excellent level of non-donation investments for nearly $2.8 million. The bank made a $1.0 million equity equivalent investment in a Spokane area CDFI that provides small business and home loans. The bank also purchased an MBS that promotes an affordable, multifamily housing project in the bank's Seattle-Bellevue-Kent AA, with an investment amount of approximately $1.8 million.

Donations. The bank also made an excellent level of donations during the evaluation period. Most donations ($149,140) directly benefited its AAs, and ($20,500) benefited regional/statewide areas that include the bank's AAs. The following table shows the distribution of donations by AA, as well as at the regional/statewide level.

Washington Qualified Investment Donations		
Assessment Area/Region	**Bank**	
	#	$
Bingen	1	2,500
Colfax	4	20,333
Ephrata	7	5,500
Raymond-Westport	12	6,490
Seattle-Bellevue-Kent MD	5	25,050

Washington Qualified Investment Donations		
Spokane-Spokane Valley MSA	56	89,267
Regional Washington	4	8,000
State of Washington	2	12,500
Total	91	169,640

By number and dollar, the bank made most donations in the Spokane-Spokane Valley MSA AA. The bank made donations in each Washington AA except for the Kennewick-Richland MSA AA; this is reasonable given the bank's limited lending activity and deposit market share in this AA. The bank's Regional Washington donations also were to organizations whose service area include this AA. Overall, most of the donations were made to organizations that provide community services to LMI individuals. The bank supported food shelves, meal programs for children and seniors, programs for at-risk youth, clothing for children, and programs for individuals with disabilities, for example, which all target LMI individuals. The bank's donations that provided meals to children and seniors in need, particularly during the pandemic given heightened food insecurity, are especially noteworthy. The bank also made donations that promoted affordable housing efforts in the Seattle-Bellevue-Kent MD AA. Finally, the bank made a donation that helped to revitalize and stabilize a designated disaster area (wildfire) in the Colfax AA.

Because the bank's community development investment activities address needs in its Washington AAs, examiners also considered the bank's community development investments that are outside of its Washington AAs. The bank made three donations totaling $970.00 that benefited areas outside of its Washington AAs. These services support organizations that provide services to LMI individuals. The table above does not include these donations.

SERVICE TEST

The Service Test rating is outstanding for Washington. Delivery systems are generally readily accessible throughout the Washington AAs. The hours of operation and retail services do not vary in a way that inconveniences certain people or areas. In 2020, the bank's typical operating hours may have been impacted by the pandemic. Finally, the bank is a leader overall in providing community development services in the Washington AAs.

Retail Banking Services

Overall, the bank's delivery systems are readily accessible to residents and businesses throughout the bank's Washington AAs. The bank operates 18 offices, 12 drive-up facilities, and 15 ATMs in the state. The bank's Washington AAs are new since the previous evaluation due to bank mergers. The following table shows the bank's distribution of branches and drive-up facilities as of 2020.[56]

[56] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within one mile of their prior location are not shown in the table.

Geographic Distribution of Branches
State of Washington

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			16	4.6%	5.0%	5.1%
	LS	0		0	0							
Moderate	**Total**	**5**	**27.8%**	**3**	**0**	**5**	**5**	**0**				
	DTO	0		0	0	0			91	26.1%	25.6%	26.9%
	LS	0		0	0							
Middle	**Total**	**11**	**61.1%**	**9**	**0**	**5**	**3**	**0**				
	DTO	0		0	0	0			169	48.6%	48.9%	47.3%
	LS	0		0	0							
Upper	**Total**	**2**	**11.1%**	**2**	**0**	**2**	**1**	**0**				
	DTO	0		0	0	0			66	19.0%	20.1%	20.4%
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			6	1.7%	0.4%	0.3%
	LS	0		0	0							
Totals	**Total**	**18**	**100.0%**	**14**	**0**	**12**	**9**	**0**				
	DTO	0		0	0	0			348	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

As shown in the table, the bank has 27.8% of its branches in moderate-income census tracts. The bank also has 40.0% of its ATMs in moderate-income tracts. The percentage of branches is consistent with demographics, given that 26.1% of all census tracts are moderate-income tracts; the percentage of ATMs compares well with demographics. No branches or ATMs are in low-income tracts. This is reasonable, as most of the low-income tracts are in the Seattle-Bellevue-Kent MD AA, and the bank's branch in this AA is in a moderate-income tract. According to the June 30, 2020, FDIC Deposit Market Share report, there are 24 institutions with 167 offices located in this AA (Snohomish County), and the bank's deposit market share is only 0.1%.

Refer to the Institution section of this evaluation for details on additional delivery services the bank offers.

Community Development Services

Overall, the bank is a leader in providing community development services in the Washington AAs, given the bank's overall limited presence in the state. This rating primarily reflects the bank's performance in the full-scope AA. The bank engaged in community development services in all but three of its Washington AAs (Bingen AA, Colfax AA, Kennewick-Richland MSA AA); this is reasonable, however, since these AAs have few offices and a small market presence. Most of the services (77.1%) were in the Spokane-Spokane Valley MSA AA. The table below shows the distribution of community development services by type of activity by AA or regional/statewide level.

Washington Community Development Services					
Assessment Area/Region	***Affordable Housing***	***Community Services***	***Economic Development***	***Revitalize and Stabilize***	***Total***
Ephrata	0	2	0	1	3
Raymond-Westport	0	1	0	0	1
Seattle-Bellevue-Kent MD	0	1	0	0	1
Spokane-Spokane Valley MSA	0	16	3	8	27
Regional Washington	0	1	0	0	1
State of Washington	0	0	2	0	2
Totals	**0**	**21**	**5**	**9**	**35**

Numerous employees provided their financial expertise and time to organizations that support community development initiatives in Washington, and several employees provided more than one community development service. Most service roles involved organizations that provide educational and health services as well as food and clothing for LMI individuals, including children and seniors. Bank employees also provided services to organizations that helped revitalize and stabilize low- and moderate-income and distressed areas of Washington as well as organizations that support economic development initiatives. Employees often held leadership positions within these organizations, including serving on the board of directors or on loan committees. Overall, the bank's services are highly responsive to the community development needs of the areas the bank serves, such as addressing food insecurity during the pandemic. Based on 2020 FFIEC adjusted census data, 24.3% and 17.0% of households in the Washington AAs are low- and moderate-income levels, respectively; 12.8% are below poverty level.

Because the bank's community development service activities address needs in its Washington AAs, examiners also considered the bank's community development services that are outside of its Washington AAs. The bank provided three services that benefited areas outside of its Washington AAs. These services support organizations that provide services to LMI individuals and promote affordable housing efforts. The table above does not include these services.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPOKANE-SPOKANE VALLEY, WASHINGTON, MSA ASSESSMENT AREA

Bank Information. The bank operates nine full-service branches, most with drive-up facilities, cash-dispensing-only ATMs, and extended weekday hours, in the Spokane-Spokane Valley MSA AA. Five branches are in Spokane, Washington, and the bank also operates one branch each in the following Washington cities: Airway Heights, Fairfield, Rockford, and Spangle. The bank operates one stand-alone ATM in the AA. By number, the bank has 6.3% of its branches in this AA. See the Service Test section for this AA for more details on the bank's retail services.

According to the June 30, 2020, FDIC Deposit Market Share Report, the bank ranked eighth among 15 FDIC-insured institutions operating in Spokane County, with an 4.8% deposit market share and $471.1 million in deposits. The deposits in this assessment area represent 3.5% of the bank's overall deposits. The bank competes with regional banks, large national banks, community banks, and credit unions.

Assessment Area Information. The Spokane-Spokane Valley MSA AA consists of Spokane County in eastern Washington state. Spokane County, along with Stevens County, comprise the Spokane-Spokane Valley MSA. A very small parcel of the Kalispel Reservation is located in Spokane County; the majority of the reservation is in nearby Pend Oreille County.[57] Spokane is the largest city and county seat of Spokane County. This AA is new since the previous examination and became effective with the INB merger in late 2018. The AA's 105 census tracts include one low-, 28 moderate-, 50 middle- 25 upper-, and one unknown-income census tracts. The AA is adjacent to the bank's Colfax, Washington AA and its Coeur d'Alene, Idaho MSA AA.

The following Combined Demographics Report provides demographic information for this AA, based on 2020 FFIEC adjusted census data and 2020 D&B data.[58]

Combined Demographics Report

2020 Spokane-Spokane Valley, WA MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.0	342	0.3	189	55.3	24,173	20.2
Moderate	28	26.7	25,559	21.3	5,659	22.1	20,095	16.8
Middle	50	47.6	53,811	44.9	4,819	9.0	26,416	22.1
Upper	25	23.8	39,460	32.9	1,518	3.8	49,083	41.0
Unknown	1	1.0	595	0.5	123	20.7	0	0.0
Total AA	**105**	**100.0**	**119,767**	**100.0**	**12,308**	**10.3**	**119,767**	**100.0**

[57] The Kalispel Tribe of Indians operates a resort and casino on this trust land in Airway Heights, Washington.

[58] The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,171	75	0.1	6.4	1,001	85.5	95	8.1
Moderate	53,812	21,158	17.8	39.3	27,028	50.2	5,626	10.5
Middle	91,290	55,884	46.9	61.2	28,980	31.7	6,426	7.0
Upper	56,426	41,551	34.9	73.6	11,419	20.2	3,456	6.1
Unknown	2,788	428	0.4	15.4	1,947	69.8	413	14.8
Total AA	**205,487**	**119,096**	**100.0**	**58.0**	**70,375**	**34.2**	**16,016**	**7.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	745	3.1	655	3.0	83	5.1	7	4.2
Moderate	7,297	30.7	6,551	29.8	711	44.1	35	21.1
Middle	9,343	39.3	8,656	39.4	624	38.7	63	38.0
Upper	6,154	25.9	5,922	26.9	173	10.7	59	35.5
Unknown	227	1.0	203	0.9	22	1.4	2	1.2
Total AA	**23,766**	**100.0**	**21,987**	**100.0**	**1,613**	**100.0**	**166**	**100.0**
Percentage of Total Businesses:				**92.5**		**6.8**		**0.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.3	2	0.3	0	0.0	0	0.0
Moderate	53	8.0	47	7.3	5	50.0	1	33.3
Middle	318	48.2	312	48.2	5	50.0	1	33.3
Upper	287	43.5	286	44.2	0	0.0	1	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**660**	**100.0**	**647**	**100.0**	**10**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**98.0**		**1.5**		**0.5**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Spokane-Spokane Valley MSA, for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels Spokane-Spokane Valley, WA MSA					
FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2019	**$67,400**	0 - $33,699	$33,700 - $53,919	$53,920 - $80,879	$80,880 - & above
2020	**$70,100**	0 - $35,049	$35,050 - $56,079	$56,080 - $84,119	$84,120 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC's adjusted census data median family income for the Spokane-Spokane Valley MSA, which was $62,064 for 2019 and 2020.

Population. According to 2020 FFIEC adjusted census data, the total population of the AA is 480,832, which is the majority (91.7%) of the population of the Spokane-Spokane Valley MSA. The largest age group of the AA is people who are 25 to 64 years of age, which comprises 52.4% of the AA's population. The remaining age groups are as follows: residents 17 years and younger (22.6%), residents 65 years and older (14.3%), and residents aged 18 to 24 years (10.7%). A community contact indicated that the Spokane area population has increased the past few years, with people moving to the area for its quality of life and recreational opportunities.

Housing Information. According to 2020 FFIEC adjusted census data, this AA has 205,487 housing units: 58.0% are owner-occupied, 34.2% are rental units, and 7.8% are vacant. The median age of the housing stock is 46 years, which is somewhat higher than the statewide median of 35 years. The median housing value is $183,276 and the affordability ratio is 27.3, compared to 23.5 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Community contacts indicated that affordable housing has been a longstanding concern in Spokane, and that the pandemic exacerbated the issue. Rapidly increasing home prices over the past few years has presented challenges for lower-income individuals, especially first-time homebuyers. A contact indicated that waiting lists for affordable housing programs are long, that the median housing price was high at $395,000 in 2020, and that there is a shortage of houses and rental units considered affordable for lower-income individuals. Bank management stated that the cost of homeownership is significantly higher than renting, which was a change in recent years, and much of the new development in the area has been multifamily projects, some of which are considered affordable. Redevelopment of blighted areas in old, lower-income neighborhoods near the downtown core has been rapidly occurring in Spokane.

The table below shows the housing cost burden in the AA, the MSA, and the state of Washington, for individuals of different income levels. As reflected in the table, individuals in both the low- and moderate-income brackets for both renter and homeowner categories exceed HUD's 30% cost-burden threshold, although the difference is greater for low-income individuals. The cost burden for renters and homeowners in the AA is similar to the MSA and the state.

Spokane-Spokane Valley, WA MSA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Spokane-Spokane Valley, WA MSA AA	80%	48%	47%	68%	45%	22%
Spokane-Spokane Valley, WA MSA	79%	47%	47%	67%	44%	22%
Washington	79%	50%	44%	66%	46%	23%
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						

General Economic and Business Information. According to community contacts and bank management, the local economy is strong overall, despite the pandemic, and its diversity provides stability. Spokane is a regional center of services for the surrounding rural populations of eastern Washington and northern Idaho. Economic drivers include agriculture, health care, military, higher education, and airframe production. The Fairchild Air Force Base and several universities and colleges are located in the Spokane area. Historically, the area has been natural resource-based and dependent on products produced from farms, forests, and mines, given geographic characteristics of the regional area such as forest cover, farmland, and mountain ranges. Bank management and community contacts indicated there are many recreational opportunities for residents, which also attract visitors, including hiking, fishing, hunting, skiing, and whitewater rafting.

Major local employers include the Fairchild Air Force Base, state government, universities, school districts, a large electric and natural gas utility company, aerospace manufacturers, and a resort and casino. Some residents of Coeur d'Alene, Idaho, commute to Spokane for work because of Washington state's higher minimum wage, according to bank management.

Bank management indicated that local businesses recovered well from the pandemic, and that the area did not lose many businesses. PPP loans helped sustain operations for many businesses. Occupancy in the industrial park in Spokane Valley has been high, and businesses operating in the park have been consistently hiring employees. Although, as occurring in other areas of the country, many local employers have experienced challenges in finding workers. Growth in the aerospace sector has been strong. Finally, the agricultural economy has been strong overall due to high production, good weather and prices, and federal agriculture bills that helped farmers, according to a contact; many farmers did very well in 2020.

The annual average unemployment rate for the AA was consistent with the rate for the Spokane-Spokane Valley MSA, and slightly above that of the state. A community contact indicated that a spike in the unemployment rate occurred in 2020 due to the pandemic, although it has since recovered. The following table provides the annual average unemployment rates for the AA, the MSA, and the state of Washington.

Annual Average Unemployment Rates		
Area	2019	2020
Spokane-Spokane Valley, WA MSA AA	5.23%	8.75%
Spokane-Spokane Valley, WA MSA	5.35%	8.80%
Washington	4.15%	8.41%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics		

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPOKANE-SPOKANE VALLEY MSA AA

The bank's Lending Test performance in the AA is good. Lending levels show good responsiveness to AA credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is good. The overall geographic distribution of loans is also good. The bank is a leader in making community development loans and extended a very notable level benefiting this AA. Further, this is a relatively smaller market for the institution, and the bank made its second highest level of community development loans in this AA. Overall, the bank uses flexible loan programs (notably PPP lending) to help meet credit needs. Examiners assigned the most weight to small business and HMDA loans based on the total number and dollar volume of loans, respectively, during the evaluation period, followed by consumer lending. Examiners did not include the bank's small farm lending in the analysis based on the comparison of loan volume to other products.

The Investment Test performance in this AA is excellent. The bank made an excellent level of qualified investments, including donations, that show excellent responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the AA and do not vary in a way that inconveniences any particular individuals or areas. The bank is a leader in providing community development services.

LENDING TEST

The bank's Lending Test performance in the AA is good.

Lending Activity

Overall, the bank's lending activity reflects good responsiveness to AA credit needs. For HMDA loans, the bank ranked 45th among 395 lenders reporting HMDA loans in 2019 and 44th among 424 lenders in 2020. The bank's market share of HMDA lending averaged 0.5% for both years. For small business lending, the bank ranks 16th out of 69 lenders reporting CRA data in 2019 and 16th among 90 lenders in 2020. The bank's market share for small business loans was 1.0% in 2019 and slightly higher in 2020 due to PPP lending. During the evaluation period, lending activity in this AA represented approximately 2.0% by number and 4.3% by dollar amount of the bank's total lending. Within the Washington AAs, the lending activity in this AA was approximately 68.0% by number and 81.4% by dollar amount.

Distribution by Borrower Income Level and by Size of Businesses

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. At the product level, examiners evaluated home purchase, refinance, and home improvement loans based on number volume. The following tables show the bank's HMDA loan data by income level and product type for 2019 and 2020. The tables also include aggregate lending data for each year and demographics for families at various income levels.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (1 of 2)
Assessment Area: Spokane-Spokane Valley, WA MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	4.3	4.5	174	1.4	2.4	1	2.3	4.2	214	1.4	2.2	20.2
Moderate	3	6.5	17.2	458	3.8	12.0	2	4.7	19.1	516	3.4	14.4	16.8
Middle	6	13.0	24.8	1,269	10.4	22.5	9	20.9	25.7	2,504	16.7	24.0	22.1
Upper	24	52.2	38.6	7,596	62.5	49.0	25	58.1	42.8	9,689	64.7	51.1	41.0
Unknown	11	23.9	14.9	2,661	21.9	14.2	6	14.0	8.2	2,044	13.7	8.1	0.0
Total	46	100.0	100.0	12,158	100.0	100.0	43	100.0	100.0	14,967	100.0	100.0	100.0
Refinance Loans													
Low	2	6.5	5.1	320	4.5	2.8	6	4.4	4.1	569	1.8	2.2	20.2
Moderate	0	0.0	14.2	0	0.0	9.7	13	9.6	13.0	2,095	6.6	9.1	16.8
Middle	7	22.6	20.8	1,505	21.1	17.4	28	20.7	20.9	5,749	18.1	18.0	22.1
Upper	18	58.1	41.6	4,562	63.8	49.0	63	46.7	41.8	18,137	57.0	48.7	41.0
Unknown	4	12.9	18.3	760	10.6	21.1	25	18.5	20.3	5,289	16.6	22.0	0.0
Total	31	100.0	100.0	7,147	100.0	100.0	135	100.0	100.0	31,839	100.0	100.0	100.0
Home Improvement Loans													
Low	2	13.3	5.1	186	20.2	3.6	1	3.2	4.3	104	2.1	3.1	20.2
Moderate	3	20.0	13.4	75	8.2	11.9	3	9.7	13.5	340	7.0	10.8	16.8
Middle	2	13.3	24.3	75	8.2	21.8	7	22.6	21.3	730	15.0	18.7	22.1
Upper	8	53.3	55.4	584	63.5	60.4	18	58.1	58.6	3,575	73.5	63.7	41.0
Unknown	0	0.0	1.7	0	0.0	2.4	2	6.5	2.3	116	2.4	3.6	0.0
Total	15	100.0	100.0	920	100.0	100.0	31	100.0	100.0	4,865	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	6.2	5.0	695	3.1	2.6	9	4.0	4.1	970	1.8	2.2	20.2
Moderate	7	6.2	15.4	573	2.5	10.8	20	8.9	14.9	3,266	6.0	11.0	16.8
Middle	18	15.9	22.8	3,154	13.9	20.0	47	20.9	22.3	9,563	17.5	20.1	22.1
Upper	66	58.4	41.8	14,878	65.5	49.5	115	51.1	43.2	33,307	61.0	49.9	41.0
Unknown	15	13.3	15.1	3,421	15.1	17.0	34	15.1	15.6	7,469	13.7	16.8	0.0
Total	113	100.0	100.0	22,721	100.0	100.0	225	100.0	100.0	54,575	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level (2 of 2)
Assessment Area: Spokane-Spokane Valley, WA MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	5.3	5.2	15	0.7	3.1	1	6.3	3.2	83	2.9	1.7	20.2
Moderate	1	5.3	12.9	40	1.7	8.3	2	12.5	12.9	315	10.8	9.2	16.8
Middle	3	15.8	22.1	305	13.2	17.4	3	18.8	21.3	580	20.0	16.4	22.1
Upper	14	73.7	57.2	1,942	84.4	68.2	9	56.3	59.7	1,906	65.6	70.0	41.0
Unknown	0	0.0	2.5	0	0.0	3.0	1	6.3	2.8	20	0.7	2.7	0.0
Total	19	100.0	100.0	2,302	100.0	100.0	16	100.0	100.0	2,904	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.8	0	0.0	4.4	0	0.0	4.2	0	0.0	3.7	20.2
Moderate	0	0.0	13.0	0	0.0	7.6	0	0.0	16.9	0	0.0	12.6	16.8
Middle	0	0.0	16.9	0	0.0	11.0	0	0.0	20.8	0	0.0	17.3	22.1
Upper	2	100.0	56.4	194	100.0	67.1	0	0.0	50.4	0	0.0	59.2	41.0
Unknown	0	0.0	4.9	0	0.0	9.8	0	0.0	7.7	0	0.0	7.3	0.0
Total	2	100.0	100.0	194	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	17.6	0	0.0	1.7	0	0.0	0.6	0	0.0	0.3	20.2
Moderate	0	0.0	6.1	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	16.8
Middle	0	0.0	1.2	0	0.0	2.1	0	0.0	0.0	0	0.0	0.0	22.1
Upper	0	0.0	2.9	0	0.0	6.4	0	0.0	0.0	0	0.0	0.0	41.0
Unknown	0	0.0	72.2	0	0.0	89.0	0	0.0	99.4	0	0.0	99.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2019 and 2020, the bank's overall lending to low-income borrowers was comparable to aggregate lenders and was below demographics. The bank's overall lending to moderate-income borrowers in 2019 and 2020 was below aggregate lenders and demographics. Based on 2019 and 2020 FFIEC adjusted census data, 20.2% of the families in the AA are low income and 16.8% are moderate income. The bank's performance in lending to moderate-income borrowers is reasonable given the bank's very small market share of HMDA loans in the AA due to strong competition, and bank management indicated that the bank is known for commercial lending in this market. The bank competes with many institutions for HMDA loans, especially mortgage companies, according to bank management, as well as credit unions, regional banks, and large national banks. In 2020, for example, the two leading HMDA lenders by far in the market were a credit union and mortgage company. Further, community contacts indicated that the pandemic exacerbated the area's longstanding affordable housing concerns.

Given the context discussed above, the bank's performance in lending to low-income borrowers is notable. For the products analyzed and for each year, the bank's lending to low-income borrowers is

comparable to aggregate lenders, except for 2019 home improvement lending where the bank's performance exceeded peer.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, based on the 2020 FFIEC estimated median family income of $70,100 for the Spokane-Spokane Valley MSA, an individual with the highest income in the low-income bracket ($35,049) could afford a $105,147 home. Using the same assumption, borrowers with the highest income in the moderate-income bracket ($56,079) could afford a $168,237 home. According to 2020 FFIEC adjusted census data, the median housing value in the AA is $183,276. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers.

In this AA, the bank made use of flexible lending programs to help meet the credit needs of LMI borrowers. The bank participated in FHA and VA programs. During the evaluation period, the bank made loans through these programs totaling over $1.8 million. For more information on these flexible lending programs, refer to the Institution section of this evaluation.

Consumer. The bank's consumer lending to LMI borrowers is good. At the product level, examiners evaluated all loan types based on number volume. The following tables show the bank's consumer loan data by product, as well as by borrower and tract income, for 2019 and 2020.

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower
Assessment Area: 2019 Spokane-Spokane Valley, WA MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	4.7%	12	1.4%
Moderate	12	27.9%	188	21.6%	5	11.6%	91	10.4%
Low/Moderate Total	12	27.9%	188	21.6%	7	16.3%	103	11.8%
Middle	23	53.5%	499	57.2%	19	44.2%	288	33.0%
Upper	8	18.6%	185	21.2%	17	39.5%	481	55.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	872	100.0%	43	100.0%	872	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	12.5%	29	4.9%
Moderate	4	25.0%	71	12.0%	2	12.5%	21	3.6%
Low/Moderate Total	4	25.0%	71	12.0%	4	25.0%	50	8.5%
Middle	7	43.8%	366	61.9%	3	18.8%	59	10.0%
Upper	5	31.3%	154	26.1%	9	56.3%	482	81.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	591	100.0%	16	100.0%	591	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	7.7%	7	2.3%
Moderate	12	46.2%	103	33.3%	10	38.5%	78	25.2%

Distribution of 2019 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2019 Spokane-Spokane Valley, WA MSA								
Low/Moderate Total	12	46.2%	103	33.3%	12	46.2%	85	27.5%
Middle	9	34.6%	138	44.7%	4	15.4%	72	23.3%
Upper	5	19.2%	68	22.0%	9	34.6%	140	45.3%
Unknown	0	0.0%	0	0.0%	1	3.8%	12	3.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	309	100.0%	26	100.0%	309	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	7.1%	48	2.7%
Moderate	28	32.9%	362	20.4%	17	20.0%	190	10.7%
Low/Moderate Total	28	32.9%	362	20.4%	23	27.1%	238	13.4%
Middle	39	45.9%	1,003	56.6%	26	30.6%	419	23.6%
Upper	18	21.2%	407	23.0%	35	41.2%	1,103	62.2%
Unknown	0	0.0%	0	0.0%	1	1.2%	12	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	85	100.0%	1,772	100.0%	85	100.0%	1,772	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Spokane-Spokane Valley, WA MSA								
	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	%	$(000s)	%	#	%	$(000s)	%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	2.3%	38	4.1%
Moderate	12	27.9%	233	25.1%	13	30.2%	182	19.6%
Low/Moderate Total	12	27.9%	233	25.1%	14	32.6%	220	23.7%
Middle	19	44.2%	381	41.0%	7	16.3%	110	11.8%
Upper	12	27.9%	315	33.9%	22	51.2%	599	64.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	929	100.0%	43	100.0%	929	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	14.3%	101	7.9%
Moderate	3	10.7%	60	4.7%	2	7.1%	96	7.5%
Low/Moderate Total	3	10.7%	60	4.7%	6	21.4%	197	15.4%
Middle	9	32.1%	372	29.0%	5	17.9%	278	21.7%
Upper	14	50.0%	825	64.3%	16	57.1%	781	60.9%
Unknown	2	7.1%	26	2.0%	1	3.6%	27	2.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	1,283	100.0%	28	100.0%	1,283	100.0%

Distribution of 2020 Consumer Lending By Income Level of Tract and Borrower Assessment Area: 2020 Spokane-Spokane Valley, WA MSA								
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	8.7%	34	6.3%
Moderate	7	30.4%	79	14.5%	8	34.8%	87	16.0%
Low/Moderate Total	7	30.4%	79	14.5%	10	43.5%	121	22.3%
Middle	6	26.1%	175	32.2%	4	17.4%	80	14.7%
Upper	9	39.1%	264	48.6%	9	39.1%	342	63.0%
Unknown	1	4.3%	25	4.6%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	543	100.0%	23	100.0%	543	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	7	7.4%	173	6.3%
Moderate	22	23.4%	372	13.5%	23	24.5%	365	13.2%
Low/Moderate Total	22	23.4%	372	13.5%	30	31.9%	538	19.5%
Middle	34	36.2%	928	33.7%	16	17.0%	468	17.0%
Upper	35	37.2%	1,404	51.0%	47	50.0%	1,722	62.5%
Unknown	3	3.2%	51	1.9%	1	1.1%	27	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	94	100.0%	2,755	100.0%	94	100.0%	2,755	100.0%

In 2019, the bank's overall lending to low-income borrowers was below demographics and slightly above demographics for lending to moderate-income borrowers. For motor vehicle and other secured loans, the bank's lending was below demographics for moderate-income borrowers. In 2020, the bank's overall lending to low-income borrowers was also below demographics, and it was above demographics for moderate-income borrowers. For other secured loans, the bank's lending was below demographics for moderate-income borrowers. According to 2019 and 2020 FFIEC adjusted census data, 24.3% of households in the AA are low income and 16.3% are moderate income.

In each year, the bank's other unsecured lending to moderate-income borrowers exceeded demographics. For each year, the bank's lowest level of lending to low-income borrowers was in motor vehicle lending, which is reasonable. Bank management indicated that borrowers who obtain motor vehicle loans from the bank are typically also commercial customers, and it is for convenience purposes. Generally, most individuals purchasing a vehicle obtain financing with a credit union, through one of the large national banks operating in the area who have strong relationships with automobile dealers, or through direct dealer financing.

The bank faces especially strong competition for consumer loans from credit unions, who offer very low interest rates and are known for consumer lending, according to bank management.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the small business loan data by revenue and loan size for 2019 and 2020. The table also includes information for aggregate lenders, for comparison purposes.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Spokane-Spokane Valley, WA MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	49	53.8	49.1	6,663	41.1	34.5	52	8.3	41.2	6,000	9.0	22.6	92.5
Over $1 Million	40	44.0		9,468	58.4		61	9.8		13,777	20.7		6.8
Revenue Unknown	2	2.2		83	0.5		510	81.9		46,731	70.3		0.7
Total	91	100.0		16,214	100.0		623	100.0		66,508	100.0		100.0
By Loan Size													
$100,000 or Less	53	58.2	91.7	1,899	11.7	29.3	438	70.3	83.1	14,488	21.8	25.7	
$100,001 - $250,000	15	16.5	3.5	2,869	17.7	13.7	113	18.1	9.2	17,691	26.6	20.9	
$250,001 - $1 Million	23	25.3	4.8	11,446	70.6	57.1	72	11.6	7.7	34,329	51.6	53.4	
Total	91	100.0	100.0	16,214	100.0	100.0	623	100.0	100.0	66,508	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	35	71.4		1,108	16.6		38	73.1		1,020	17.0		
$100,001 - $250,000	5	10.2		902	13.5		5	9.6		853	14.2		
$250,001 - $1 Million	9	18.4		4,653	69.8		9	17.3		4,127	68.8		
Total	49	100.0		6,663	100.0		52	100.0		6,000	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending to small businesses slightly exceeded aggregate lenders' activity in 2019 and was below aggregate lenders in 2020. According to 2019 and 2020 D&B data, 91.8% and 92.5% of businesses had gross annual revenues of $1 million or less, respectively. For both years, the bank and aggregate lenders were below demographic data. The bank was below aggregate lenders when extending loans for amounts of $100,000 or less, as shown in the table. However, over 2019 and 2020, the bank averaged 68.8% of its small business loans for amounts of $100,000 or less. This indicates a willingness to meet the credit needs of small businesses that tend to request small-dollar loans. The bank competes with many financial institutions, including large national banks, as well as credit card lenders who are ranked higher in market share in the AA.

The bank's lending to businesses with unknown revenue significantly increased from 2019 to 2020. The increase is attributable to the bank's participation in the PPP loan program, which allowed lenders to approve and originate loans without documenting the revenue of the applicants. In 2020, the bank made extensive use of this program; these loans were designed to help businesses keep their workforces employed during the pandemic. The bank originated approximately 500 PPP loans for $45.0 million in this AA (in amounts of $1 million or less), of which approximately 55.7% were for $50,000 or less. These loan amounts suggest that many of the bank's PPP loans were made to small businesses. The bank's PPP lending is highly responsive to small business credit needs and enhances the bank's performance.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's small business, HMDA, and consumer loans in the AA is good. For both 2019 and 2020, the AA had one low-income and 28 moderate-income census tracts, as well as one unknown-income tract.[59] Middle-income tracts are the highest by number and represent 47.6% of tracts. Three of the bank's offices in the AA are in moderate-income tracts, and two of the offices in middle-income tracts are very near moderate-income tracts. The bank's geographic distribution of loans does not reveal any unexplained gaps in lending.

Residential Real Estate. The geographic distribution of residential real estate loans is good. At the product level, examiners evaluated home purchase, refinance, home improvement, and multifamily loans based on volume.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Spokane-Spokane Valley, WA MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.1
Moderate	7	15.2	26.6	1,397	11.5	18.2	1	2.3	27.1	272	1.8	18.6	17.8
Middle	25	54.3	42.9	5,798	47.7	40.9	12	27.9	42.6	3,334	22.3	40.6	46.9
Upper	14	30.4	30.0	4,963	40.8	40.5	27	62.8	29.7	10,227	68.3	40.1	34.9
Unknown	0	0.0	0.3	0	0.0	0.4	3	7.0	0.5	1,134	7.6	0.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	12,158	100.0	100.0	43	100.0	100.0	14,967	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.1	0	0.0	0.1	2	1.5	0.1	260	0.8	0.1	0.1
Moderate	8	25.8	17.0	1,143	16.0	11.7	17	12.6	14.7	2,544	8.0	10.1	17.8
Middle	9	29.0	42.8	2,170	30.4	38.2	48	35.6	41.7	9,760	30.7	37.5	46.9
Upper	14	45.2	39.8	3,834	53.6	49.7	66	48.9	43.1	18,828	59.1	51.8	34.9
Unknown	0	0.0	0.3	0	0.0	0.4	2	1.5	0.4	447	1.4	0.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	7,147	100.0	100.0	135	100.0	100.0	31,839	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	4	26.7	16.1	213	23.2	12.5	3	9.7	12.7	403	8.3	10.0	17.8
Middle	7	46.7	43.9	446	48.5	40.4	12	38.7	43.6	1,177	24.2	38.4	46.9

[59] Spokane Falls Community College and the Washington National Guard are located in unknown-income tract 36.00.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2)
Assessment Area: Spokane-Spokane Valley, WA MSA

Upper	4	26.7	39.7	261	28.4	46.8	16	51.6	43.2	3,285	67.5	50.7	34.9
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	920	100.0	100.0	31	100.0	100.0	4,865	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	1.6	0	0.0	0.2	0	0.0	2.0	0	0.0	1.1	2.0
Moderate	3	33.3	33.9	25,175	42.8	39.3	5	41.7	32.9	19,189	34.3	41.1	38.6
Middle	5	55.6	46.5	30,275	51.4	38.3	7	58.3	43.4	36,825	65.7	35.1	36.5
Upper	1	11.1	11.8	3,415	5.8	19.6	0	0.0	11.2	0	0.0	19.2	17.6
Unknown	0	0.0	6.3	0	0.0	2.6	0	0.0	10.5	0	0.0	3.5	5.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	58,865	100.0	100.0	12	100.0	100.0	56,014	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.1	0	0.0	0.1	2	0.8	0.1	260	0.2	0.1	0.1
Moderate	27	22.1	21.4	28,271	34.7	17.1	28	11.8	18.8	22,669	20.5	14.3	17.8
Middle	52	42.6	42.8	39,210	48.1	39.5	85	35.9	42.2	52,127	47.1	38.5	46.9
Upper	43	35.2	35.3	14,105	17.3	42.8	116	48.9	38.5	33,792	30.6	46.4	34.9
Unknown	0	0.0	0.4	0	0.0	0.6	6	2.5	0.5	1,741	1.6	0.6	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	122	100.0	100.0	81,586	100.0	100.0	237	100.0	100.0	110,589	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (2 of 2)
Assessment Area: Spokane-Spokane Valley, WA MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	4	21.1	14.8	224	9.7	8.9	2	12.5	12.3	261	9.0	8.2	17.8
Middle	6	31.6	40.0	521	22.6	34.6	6	37.5	41.6	1,031	35.5	33.1	46.9
Upper	9	47.4	44.8	1,557	67.6	56.0	7	43.8	45.6	1,452	50.0	57.7	34.9
Unknown	0	0.0	0.4	0	0.0	0.4	1	6.3	0.6	160	5.5	1.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	2,302	100.0	100.0	16	100.0	100.0	2,904	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.4	0	0.0	0.0	0.1
Moderate	1	50.0	17.6	119	61.3	10.9	0	0.0	12.7	0	0.0	8.9	17.8
Middle	0	0.0	40.1	0	0.0	31.7	0	0.0	45.0	0	0.0	42.1	46.9

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography (1 of 2) Assessment Area: Spokane-Spokane Valley, WA MSA													
Upper	1	50.0	41.0	75	38.7	54.9	0	0.0	41.5	0	0.0	48.5	34.9
Unknown	0	0.0	1.3	0	0.0	2.5	0	0.0	0.4	0	0.0	0.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	194	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	36.3	0	0.0	17.2	0	0.0	32.1	0	0.0	22.9	17.8
Middle	0	0.0	40.8	0	0.0	48.2	0	0.0	47.0	0	0.0	45.9	46.9
Upper	0	0.0	22.4	0	0.0	34.6	0	0.0	20.6	0	0.0	30.7	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.5	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank did not extend any HMDA loans in the low-income census tract in 2019, which is reasonable given that only 0.3% of families and 0.1% of owner-occupied units in the AA are located here, according to 2019 and 2020 FFIEC adjusted census data. The same data shows that most housing units are rental units (85.5%) or vacant (8.1%) in the low-income tract. In 2020, 0.8% of the bank's HMDA loans were to borrowers in the low-income tract, which is comparable to demographics. Similarly, aggregate lenders reported only 0.1% of loans in the low-income tract for each year. According to bank management, the low-income tract has a lot of rental housing and is near the university district, where a few universities operate. Redevelopment of this low-income area, particularly in multifamily housing, has been rapidly occurring in the past few years.

The bank made 22.1% of its HMDA loans in 2019 to borrowers residing in moderate-income tracts, which is comparable to aggregate lenders who reported 21.4%, and above demographic data in the table. In 2020, the bank made 11.8% of HMDA loans to borrowers residing in moderate-income tracts, which is below aggregate lenders, who reported 18.8%, and also below demographic data. According to 2019 and 2020 FFIEC adjusted census data, 21.3% of families reside in moderate-income tracts and 17.8% of owner-occupied units in the AA are located here.

Over 2019 and 2020, the bank made HMDA loans in all but six moderate-income tracts. The bank's performance is reasonable for several reasons. These moderate-income tracts are located in or close to downtown Spokane, where many financial institutions operate; the nearby university district, where HMDA lending opportunities are limited; and Spokane Valley, where other financial institutions also operate. Finally, competition for HMDA loans is strong, and the bank has a small market share of HMDA loans in the AA.

Consumer. The geographic distribution of consumer loans is good overall. At the product level, examiners evaluated all loan types based on number volume. Refer to the 2019 and 2020 consumer lending tables provided earlier in this AA section for data on the bank's consumer loans by census tract income level and product type. Aggregate lending data is not available for consumer lending.

In 2019 and 2020, the bank did not extend any consumer loans in the low-income census tract. According to 2019 and 2020 FFIEC adjusted census data, only 0.6% of households in the AA reside in the low-

income tract. Further, of the households residing in the low-income tract, 41.4% are below the poverty level; many of these households would likely not be able to afford a consumer loan. The bank's lack of lending is reasonable given demographics; further, bank management indicated competition from credit unions is strong in this area.
In 2019, the bank's overall level of lending in the moderate-income tracts at 32.9%, which is above demographics. By product in 2019, the bank's performance is comparable to demographics except for other-unsecured lending, which greatly exceeds demographics. In 2020, the bank's overall level of lending in the moderate-income tracts at 23.4% is comparable to demographics. By product in 2020, the bank's performance varies, and, similar to 2019, is strongest for other-unsecured lending. Adjusted FFIEC census data for 2019 and 2020 indicates that 25.4% of households reside in the moderate-income tracts of the AA.

Over 2019 and 2020, the bank extended consumer loans in all but ten of the moderate-income census tracts. The bank's performance is reasonable for several reasons. These moderate-income tracts are located in or close to downtown Spokane where many financial institutions operate, the nearby university district where lending opportunities from students is limited, and in Spokane Valley and Cheney, Washington, where other financial institutions also operate. Overall, competition is strong, especially with credit unions.

Small Business. The geographic distribution of small business loans is excellent. The following table shows the bank's 2019 and 2020 small business loans by income level of census tract. The table also includes aggregate lending data for comparison.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Spokane-Spokane Valley, WA MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	7	7.7	2.6	1,047	6.5	3.8	30	4.8	2.9	4,254	6.4	4.0	3.1
Moderate	35	38.5	27.6	6,503	40.1	34.3	237	38.0	30.3	25,357	38.1	35.8	30.7
Middle	27	29.7	38.7	4,772	29.4	42.3	235	37.7	39.6	26,739	40.2	42.0	39.3
Upper	22	24.2	28.2	3,893	24.0	17.8	111	17.8	25.6	7,174	10.8	16.2	25.9
Unknown	0	0.0	0.7	0	0.0	0.9	10	1.6	0.9	2,984	4.5	1.6	1.0
Tract-Unk	0	0.0	2.2	0	0.0	1.0	0	0.0	0.7	0	0.0	0.4	
Total	91	100.0	100.0	16,214	100.0	100.0	623	100.0	100.0	66,508	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank was above aggregate lenders and demographics with its small business lending in the low-income tract in 2019, and comparable to aggregate and demographics in 2020. For both years, the bank exceeded aggregate lenders and demographics with its small business lending in moderate-income tracts. According to D&B data, 3.1% of businesses were located in the low-income tract for both years. In 2019, 30.9% of businesses were located in moderate-income tracts and in 2020, 30.7% were located in moderate-income tracts. As mentioned above, three of the bank's nine offices in the AA are in moderate-income tracts and two are very near moderate-income tracts. Over 2019 and 2020, the bank extended

small business loans in all but five moderate-income tracts, which is reasonable because several of these tracts are in or close to downtown Spokane or the nearby university district; numerous financial institutions operate in this general area, and competition is strong, according to bank management. The remaining moderate-income tract with no small business loans is in Cheney, where the bank does not have an office and where other financial institutions operate. Finally, the bank's market share of small business loans in the AA is small.

Community Development Loans

The bank is a leader in making community development loans in the AA. As shown in the table at the right, the bank originated seven community development loans totaling $37.4 million. By dollar, the majority of the loans helped revitalize and stabilize low- and moderate-income areas; specifically, with these three loans, the bank provided financing for the construction of multifamily housing, which helps attract and retain residents. Further, the bank made three loans with an affordable housing purpose; two of these loans were for the construction of apartment complexes with rental units affordable to LMI individuals. A community contact indicated that affordable housing has been a longstanding concern in the Spokane area, and that there is a shortage of affordable rental units. Finally, the bank extended a line of credit to a nonprofit organization that promotes economic development. The bank's community development loans show excellent responsiveness to community needs.

Community Development Loans
Spokane-Spokane Valley MSA AA

Purpose	#	*$*
Affordable Housing	3	9,745,357
Economic Development	1	25,000
Revitalize and Stabilize	3	27,596,250
Total	**7**	**37,366,607**

INVESTMENT TEST

The bank made an excellent level of qualified investments, including donations, in the Spokane-Spokane Valley MSA AA. The bank made a $1.0 million equity equivalent investment in an area CDFI, which provides small business and home loans; this is an excellent level of investment given the performance context. Bank management indicated that the bank faces strong competition for qualified investments in the form of bonds, and these opportunities are also limited. This investment demonstrates excellent responsiveness to the credit needs of the AA and promotes local affordable housing and economic development efforts, among other community development purposes. A community contacted indicated that First Interstate Bank is highly involved in community development activities in the Spokane area.

The bank also made an excellent level of qualified investments in the form of donations as shown in the table at right. All of the bank's donations focused on community services targeted to LMI individuals. These donations helped local organizations provide essential goods and services to those in need, such as developmental services for children, support for disabled individuals, and food. A community contact indicated that food insecurity was exacerbated during the pandemic; the bank's donation that addressed food insecurity for children was highly responsive to this identified need.

Qualified Investment Donations
in the Spokane-Spokane Valley MSA Assessment Area

Purpose	#	*$*
Community Service	56	89,267
Total	**56**	**89,267**

SERVICE TEST

The bank's delivery systems are readily accessible to residents and businesses throughout the AA, and services and hours do not vary in a way that inconveniences particular individuals or areas. The bank is a leader in providing community development services.

Retail Services

Delivery systems are readily accessible in the bank's AA. The bank's services and hours do not vary in a way that inconveniences certain individuals or areas. As stated previously, the bank operates nine full-service branches in the AA, with most offices in Spokane. These offices are new since the previous evaluation and were acquired during a bank merger. Most branches have drive-up facilities and cash-dispensing-only ATMs and offer extended weekday hours. Three branches are located in moderate-income tracts, and two of the branches located in middle-income tracts (Spokane Northside and Spokane Valley) are very near (less than one mile from) moderate-income tracts. The bank's stand-alone, cash-dispensing-only ATM is located in a moderate-income tract.

The following table shows the geographic distribution of branches in this AA.[60]

Geographic Distribution of Branches
Assessment Area: Spokane-Spokane Valley MSA

Tract Income Levels	BRANCHES								DEMOGRAPHICS			
	Total Branches			Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			1	1.0%	0.6%	3.1%
	LS	0		0	0							
Moderate	**Total**	**3**	**33.3%**	**3**	**0**	**3**	**3**	**0**				
	DTO	0		0	0	0			28	26.7%	25.4%	30.1%
	LS	0		0	0							
Middle	**Total**	**5**	**55.6%**	**5**	**0**	**4**	**2**	**0**				
	DTO	0		0	0	0			50	47.6%	44.8%	39.6%
	LS	0		0	0							
Upper	**Total**	**1**	**11.1%**	**1**	**0**	**1**	**1**	**0**				
	DTO	0		0	0	0			25	23.8%	28.0%	26.4%
	LS	0		0	0							
	Total	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				

[60] The Geographic Distribution of Branches table does not represent all details regarding branch relocations and closures. Specifically, branches that were relocated within one mile of their prior location are not shown in the table.

Unknown	DTO	0		0	0	0			1	1.0%	1.3%	0.9%
	LS	0		0	0							
	Total	**9**	**100.0%**	**9**	**0**	**8**	**6**	**0**				
Totals	DTO	0		0	0	0			105	100.0%	100.0%	100.0%
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows.
*Closed branches are only included in the "Closed" columns and are not included in any other totals.
LPOs not included in totals.

Community Development Services

The bank is a leader in providing community development services in the AA, given performance context such as limited market presence. The table to the right shows the service activity and purpose category for both years. Twelve bank employees provided 27 community development services for 14 organizations. The bank's community development services mainly focus on nonprofit organizations that provide essential services to LMI individuals, including youth, such as financial education, food, and clothing. Bank employees also provided services with economic development purposes; for example, a few services involved a local CDFI that provides small business loans. During the evaluation period, bank employees served in various roles for the organizations, such as board member, loan committee member, and presenters. The bank's services address identified community needs, such as food insecurity and small business lending, especially during the pandemic.

Community Development Services in the Spokane-Spokane Valley MSA Assessment Area	
Purpose	**#**
Community Services	16
Economic Development	3
Revitalization and Stabilization	8
Total	**27**

METROPOLITAN AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KENNEWICK-RICHLAND, WASHINGTON MSA 28420, ASSESSMENT AREA

The bank operates one branch in this AA, which includes Benton County in the south-central portion of the state. The AA is a portion of the Kennewick-Richland MSA, which is comprised of Benton and Franklin counties. The bank added this AA since the previous examination because of a bank acquisition in 2018. The bank's office in this AA is in close proximity to several moderate-income tracts. The bank did not close any branches in this AA during the evaluation period. The AA is adjacent to two other Washington AAs: Ephrata and Bingen.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KENNEWICK-RICHLAND ASSESSMENT AREA

Examiners determined that the bank's lending[61] performance in this AA is generally consistent with the performance of the full-scope metropolitan AA. The bank's service and investment performance in this AA are generally below the performance in the full-scope metropolitan AA, based on a lack of community development services and no qualified investments. However, this performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SEATTLE-BELLEVUE-KENT, WASHINGTON MD 42644, ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Snohomish County, which is located on Puget Sound. The AA is a portion of the Seattle-Bellevue-Kent MD, which is comprised of King and Snohomish counties. The bank added this AA since the previous examination because of a bank acquisition in 2017. The bank's office in this AA is in a moderate-income tract. The bank did not close any branches in this AA during the evaluation period. The Tulalip Indian Reservation is located in western Snohomish County.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SEATTLE-BELLEVUE-KENT ASSESSMENT AREA

Examiners determined that the bank's lending[62] and investment performance in this AA is generally consistent with the performance of the full-scope metropolitan AA. The bank's service performance in this AA is generally below the performance in the full-scope metropolitan AA, based on a lower level of community development services. However, this performance does not change the conclusion for the state.

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[61] Examiners did not include the bank's small farm or consumer loans in the analysis based on lending volume considerations during the scoping process. For HMDA loans, examiners reviewed the bank's 2020 loan data only due to timing of the bank acquisition (late 2018) and limited activity in 2019. For small business loans, examiners reviewed the bank's 2019 and 2020 loan data only due to timing of the bank acquisition.

[62] Examiners did not include the bank's HMDA loans in the analysis based on lending volume considerations during the scoping process. For small business loans, examiners reviewed the bank's 2020 loan data only due to limited activity in 2019. The bank did not extend any small farm loans in this AA during the evaluation period.

The bank's one qualified investment in the form of a security in the AA is noteworthy. Specifically, the bank purchased a large dollar mortgage-backed security, of which nearly $1.8 million benefited this AA and involved a LIHTC project. The bank also made one community development loan for $2.0 million, which is noteworthy, that helped revitalize and stabilize a moderate-income census tract.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF WASHINGTON

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank's community development lending and qualified investments for each AA. The Washington state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited-scope AAs, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review
Washington MSA/MD Assessment Areas

Assessment Area	*Lending Test*	*Investment Test*	*Service Test*
Kennewick-Richland MSA	Consistent	Below	Below
Seattle-Bellevue-Kent MD	Consistent	Consistent	Below

NONMETROPOLITAN STATEWIDE AREAS
LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BINGEN, WASHINGTON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Klickitat County, in the south-central portion of the state. The Columbia River flows along the southern portion of Klickitat County and forms the border between Washington and Oregon. The bank added this AA since the previous examination because of a bank acquisition in 2018. The AA is adjacent to the bank's Kennewick-Richland MSA AA in Washington and the Hood River and The Dalles AAs in Oregon. The Yakama Reservation is primarily in Yakima County, which is adjacent to the AA, with small portions throughout Klickitat County. There are no low- or moderate-income tracts in this AA. The bank did not close any branches in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BINGEN ASSESSMENT AREA

Examiners determined that the bank's lending[63] performance in this AA exceeds the overall state rating. The bank's service and investment performance in this AA is below the performance of the state, based on a lack of community development services and limited qualified investments. However, this performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLFAX, WASHINGTON ASSESSMENT AREA

The bank operates two branches in this AA that includes the entirety of Whitman County, in the southeastern portion of the state. The bank added this AA since the previous examination because of a bank acquisition in 2018. The AA is adjacent to and south of the bank's Spokane-Spokane Valley MSA AA. The bank did not close any branches in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLFAX ASSESSMENT AREA

Examiners determined that the bank's lending[64] and investment performance in this AA is generally consistent with the overall state rating. While the bank did not make any non-donation qualified investments, its donations were particularly responsive and primarily helped to revitalize and stabilize a designated disaster area due to wildfires. The bank also made a donation that helped address food insecurity for seniors during the pandemic. The bank's service performance in this AA is below the performance of the state, based on a lack of community development services as well as accessibility of delivery systems. Both offices are located in middle-income tracts that are not in close proximity to the

[63] Examiners did not include the bank's HMDA, small farm, or consumer loans in the analysis based on lending volume considerations during the scoping process. For small business loans, examiners reviewed the bank's 2020 loan data only due to timing of the bank acquisition (late 2018) and minimal lending activity in 2019.

[64] Examiners did not include the bank's HMDA or consumer loans in the analysis based on lending volume considerations during the scoping process. For small farm loans, examiners reviewed the bank's 2019 and 2020 loan data only due to timing of the bank acquisition (late 2018). For small business loans, examiners reviewed the bank's 2020 loan data only due to timing of the bank acquisition and minimal lending activity in 2019.

three low- and moderate-income tracts of the AA. However, this performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EPHRATA, WASHINGTON ASSESSMENT AREA

The bank operates one branch in this AA that includes the entirety of Grant County, in the central portion of the state. The bank added this AA since the previous examination because of a bank acquisition in 2018. The AA is adjacent to and north of the bank's Kennewick-Richland MSA AA. The bank did not close any branches in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EPHRATA ASSESSMENT AREA

Examiners determined that the bank's lending[65] performance in this AA is generally consistent with the overall state rating. The bank's investment performance in this AA is generally below the performance of the state, due to lack of non-donation qualified investments. The bank's service performance in this AA is generally below the performance of the state, due to accessibility of delivery systems. The bank's branch is located in a middle-income tract that is not in close proximity to the two low- and moderate-income tracts of the AA. However, this performance does not change the conclusion for the state.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RAYMOND-WESTPORT, WASHINGTON ASSESSMENT AREA

The bank operates three branches in this AA that includes the entirety of Grays Harbor, Pacific, and Wahkiakum counties, in the western portion of the state and along the Pacific coastline. One of the bank's offices (Westport) in this AA is in a moderate-income tract. The bank did not close any branches in this AA during the evaluation period. The bank added this AA since the previous examination because of a bank acquisition in 2017. The AA is adjacent to and north of the bank's Seaside AA in Oregon; the Columbia River forms the border between the two states. The Quinault Indian Reservation and the Chehalis Indian Reservation are primarily located in Grays Harbor County. The Shoalwater Bay Indian Reservation is located in Pacific County.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RAYMOND-WESTPORT ASSESSMENT AREA

Examiners determined that the bank's lending[66] performance in this AA is generally consistent with the overall state rating. The bank's investment performance in this AA is generally below the performance of the state, due to lack of non-donation qualified investments. The bank's service performance is also below the performance of the state, due to the low level of community development services and accessibility of delivery systems. Specifically, one of the bank's branches is located in a moderate-income tract and the

[65] Examiners did not include the bank's HMDA or consumer loans in the analysis based on lending volume considerations during the scoping process. For small farm loans, examiners reviewed the bank's 2019 and 2020 loan data only due to timing of the bank acquisition (late 2018). For small business loans, examiners reviewed the bank's 2020 loan data only due to timing of the bank acquisition and minimal lending activity in 2019.

[66] Examiners did not include the bank's HMDA or small farm loans in the analysis based on lending volume considerations during the scoping process. For small business loans, examiners reviewed the bank's 2020 loan data only due to minimal lending activity in 2018 and 2019.

remaining two branches are in middle-income tracts not in close proximity to the moderate-income tracts. However, this performance does not change the conclusion for the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF WASHINGTON

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each AA. The Washington state section of the report also shows qualified investments in the form of donations and community development services for each AA. Conclusions regarding performance of the limited scope AAs, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Washington Assessment Areas			
Assessment Area	***Lending Test***	***Investment Test***	***Service Test***
Bingen	Exceeds	Below	Below
Colfax	Consistent	Consistent	Below
Ephrata	Consistent	Below	Below
Raymond-Westport	Consistent	Below	Below

CRA Appendix A

Scope of Evaluation

SCOPE OF EVALUATION FOR LENDING ACTIVITY January 1, 2018, through December 31, 2020	
FINANCIAL INSTITUTION	***PRODUCTS REVIEWED***
First Interstate Bank	HMDA loans Consumer loans Small business loans Small farm loans
AFFILIATES	***PRODUCTS REVIEWED***
Not applicable	Not applicable
SCOPE OF EVALUATION FOR COMMMUNITY DEVELOPMENT ACTIVITY January 1, 2018, through December 31, 2020	

LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	***TYPE OF EVALUATION***	***BRANCHES VISITED***[67]	***OTHER INFORMATION***
Billings MSA, Montana	Full scope	None	
Great Falls MSA, Montana	Limited scope	None	
Missoula MSA, Montana	Limited scope	None	
Bozeman, Montana	Full scope	None	
Cut Bank, Montana	Limited scope	None	
Ennis, Montana	Limited scope	None	
Hamilton, Montana	Limited scope	None	
Hardin-Miles City, Montana	Limited scope	None	
Helena, Montana	Limited scope	None	
Kalispell, Montana	Limited scope	None	
Casper MSA, Wyoming	Full scope	None	
Cheyenne MSA, Wyoming	Limited scope	None	
Jackson, Wyoming	Limited scope	None	
Laramie, Wyoming	Limited scope	None	
Riverton, Wyoming	Limited scope	None	
Sheridan, Wyoming	Full scope	None	
Rapid City-Spearfish CSA, South Dakota	Full scope	None	
Belle Fourche, South Dakota	Limited scope	None	
Custer-Hot Springs, South Dakota	Limited scope	None	
Bend-Prineville CSA, Oregon	Full scope	None	
Eugene-Springfield MSA Oregon	Limited scope	None	
Medford-Grants Pass CSA, Oregon	Full Scope	None	

[67] There is a statutory requirement that the written evaluation of a multi-state institution's performance must list the individual branches examined in each state.

LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	*TYPE OF EVALUATION*	*BRANCHES VISITED*[67]	*OTHER INFORMATION*
Portland-Vancouver-Salem CSA, Oregon-Washington	Limited scope	None	
Seaside, Oregon	Limited scope	None	
Klamath Falls-Roseburg, Oregon	Limited scope	None	
Hood River, Oregon	Limited scope	None	
Madras, Oregon	Limited scope	None	
Newport-Lincoln City, Oregon	Limited scope	None	
The Dalles, Oregon	Limited scope	None	
Boise City-Mountain Home-Ontario CSA, Idaho-Oregon	Full scope	None	
Coeur d'Alene MSA, Idaho	Limited scope	None	
Ketchum, Idaho	Limited scope	None	
Kennewick-Richland MSA, Washington	Limited scope	None	
Seattle-Bellevue-Kent MD, Washington	Limited scope	None	
Spokane-Spokane Valley MSA, Washington	Full scope	None	
Raymond-Westport, Washington	Limited scope	None	
Bingen, Washington	Limited scope	None	
Colfax, Washington	Limited scope	None	
Ephrata, Washington	Limited scope	None	

Note: ''Branches visited'' indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Evaluation section of the report.

APPENDIX B

Summary of State Ratings

State Name	*Lending Test Rating*	*Investment Test Rating*	*Service Test Rating*	*Overall State Rating*
Montana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wyoming	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
South Dakota	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Oregon	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Idaho	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Washington	High Satisfactory	Outstanding	Outstanding	Outstanding

APPENDIX C

Glossary of Common CRA Terms

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 statistical area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. 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 on 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: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) 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 C.F.R. 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

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

Distressed nonmetropolitan middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 data such as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (i.e., approved, denied, or 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 refinancing 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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

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 statistical area/assessment area.

Metropolitan statistical area (MSA): An area, defined by the Office of Management and Budget, based on the concept of a core area with at least one urbanized area that has a population of at least 50,000. The MSA 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 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.

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 MSA. 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 MSA, the institution will receive a rating for the multistate metropolitan area.

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

Small loan to farm: 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 classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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 geography.

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 28.12.)

APPENDIX D

Lending and Demographic Tables for Limited-Scope Reviews

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Belle Fourche, SD

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	17	100.0	100.0	3,140	100.0	100.0	10	100.0	99.5	1,573	100.0	99.5	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	3,140	100.0	100.0	10	100.0	100.0	1,573	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	100.0	100.0	1,585	100.0	100.0	24	100.0	100.0	4,936	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,585	100.0	100.0	24	100.0	100.0	4,936	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	150	100.0	100.0	10	100.0	100.0	1,806	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	150	100.0	100.0	10	100.0	100.0	1,806	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	1	100.0	100.0	620	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	1	100.0	100.0	620	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Belle Fourche, SD

	Total Home Mortgage Loans												Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	30	100.0	100.0	5,219	100.0	100.0	47	100.0	99.8	9,044	100.0	99.8	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	5,219	100.0	100.0	47	100.0	100.0	9,044	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Belle Fourche, SD

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	100.0	100.0	344	100.0	100.0	2	100.0	100.0	109	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	344	100.0	100.0	2	100.0	100.0	109	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Belle Fourche, SD													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2020 FFIEC Census Data *2011-2015 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*													

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Belle Fourche, SD													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	5.9	8.8	67	2.1	4.8	1	10.0	8.0	72	4.6	5.3	24.0
Moderate	4	23.5	23.8	503	16.0	17.6	7	70.0	28.6	1,152	73.2	25.5	15.4
Middle	6	35.3	27.5	1,139	36.3	28.2	0	0.0	20.6	0	0.0	23.0	24.5
Upper	5	29.4	26.3	1,320	42.0	34.4	2	20.0	28.1	349	22.2	33.0	36.0
Unknown	1	5.9	13.8	111	3.5	15.0	0	0.0	14.6	0	0.0	13.3	0.0
Total	17	100.0	100.0	3,140	100.0	100.0	10	100.0	100.0	1,573	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.3	0	0.0	4.8	0	0.0	5.2	0	0.0	3.0	24.0
Moderate	2	28.6	17.9	354	22.3	16.3	0	0.0	14.2	0	0.0	10.6	15.4
Middle	3	42.9	25.0	729	46.0	23.8	9	37.5	22.2	1,678	34.0	20.2	24.5
Upper	2	28.6	22.6	502	31.7	26.3	12	50.0	30.2	2,826	57.3	37.3	36.0
Unknown	0	0.0	26.2	0	0.0	28.9	3	12.5	28.3	432	8.8	28.9	0.0
Total	7	100.0	100.0	1,585	100.0	100.0	24	100.0	100.0	4,936	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	0	0.0	9.1	0	0.0	1.3	0	0.0	9.1	0	0.0	4.7	15.4
Middle	0	0.0	0.0	0	0.0	0.0	3	30.0	31.8	494	27.4	36.4	24.5
Upper	1	100.0	90.9	150	100.0	98.7	7	70.0	59.1	1,312	72.6	58.9	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	150	100.0	100.0	10	100.0	100.0	1,806	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	3.3	7.6	67	1.3	4.5	1	2.2	6.1	72	0.9	3.8	24.0
Moderate	7	23.3	20.2	881	16.9	16.2	7	15.2	20.0	1,152	13.7	16.7	15.4
Middle	10	33.3	25.6	1,928	36.9	25.4	13	28.3	21.5	2,182	25.9	21.9	24.5

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Belle Fourche, SD

Upper	11	36.7	29.2	2,232	42.8	34.6	22	47.8	30.3	4,586	54.4	36.1	36.0
Unknown	1	3.3	17.3	111	2.1	19.3	3	6.5	22.2	432	5.1	21.6	0.0
Total	30	100.0	100.0	5,219	100.0	100.0	46	100.0	100.0	8,424	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Belle Fourche, SD

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	1	20.0	14.3	24	7.0	5.4	0	0.0	0.0	0	0.0	0.0	15.4
Middle	1	20.0	14.3	60	17.4	13.6	1	50.0	33.3	10	9.2	4.7	24.5
Upper	3	60.0	71.4	260	75.6	81.0	1	50.0	66.7	99	90.8	95.3	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	344	100.0	100.0	2	100.0	100.0	109	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	0	0.0	9.1	0	0.0	3.3	0	0.0	0.0	0	0.0	0.0	15.4
Middle	0	0.0	45.5	0	0.0	20.3	0	0.0	0.0	0	0.0	0.0	24.5
Upper	0	0.0	45.5	0	0.0	76.3	0	0.0	0.0	0	0.0	0.0	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.4
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	36.0
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Belle Fourche, SD

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	50	100.0	98.5	5,985	100.0	99.6	91	100.0	98.6	4,461	100.0	98.6	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.4	0	0.0	1.4	0	0.0	1.4	
Total	50	100.0	100.0	5,985	100.0	100.0	91	100.0	100.0	4,461	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Belle Fourche, SD

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	29	58.0	54.9	992	16.6	32.3	21	23.1	51.7	614	13.8	60.4	91.9
Over $1 Million	16	32.0		4,788	80.0		4	4.4		687	15.4		6.5
Revenue Unknown	5	10.0		205	3.4		66	72.5		3,160	70.8		1.7
Total	50	100.0		5,985	100.0		91	100.0		4,461	100.0		100.0
By Loan Size													
$100,000 or Less	39	78.0	91.6	1,275	21.3	30.5	83	91.2	94.3	2,107	47.2	43.1	
$100,001 - $250,000	5	10.0	3.6	755	12.6	12.4	6	6.6	2.4	871	19.5	12.9	
$250,001 - $1 Million	6	12.0	4.7	3,955	66.1	57.1	2	2.2	3.3	1,483	33.2	44.0	
Total	50	100.0	100.0	5,985	100.0	100.0	91	100.0	100.0	4,461	100.0	100.0	

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Belle Fourche, SD													
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	27	93.1		692	69.8		20	95.2		389	63.4		
$100,001 - $250,000	2	6.9		300	30.2		1	4.8		225	36.6		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	29	100.0		992	100.0		21	100.0		614	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Belle Fourche, SD													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	33	100.0	95.8	1,201	100.0	99.2	26	100.0	98.5	2,531	100.0	99.9	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	4.2	0	0.0	0.8	0	0.0	1.5	0	0.0	0.1	
Total	33	100.0	100.0	1,201	100.0	100.0	26	100.0	100.0	2,531	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Belle Fourche, SD													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	29	87.9	78.9	984	81.9	74.7	24	92.3	63.2	2,189	86.5	69.7	100.0
Over $1 Million	3	9.1		164	13.7		1	3.8		313	12.4		0.0

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Belle Fourche, SD													
Revenue Unknown	1	3.0		53	4.4		1	3.8		29	1.1		0.0
Total	33	100.0		1,201	100.0		26	100.0		2,531	100.0		100.0
By Loan Size													
$100,000 or Less	32	97.0	93.0	1,029	85.7	64.4	19	73.1	79.4	748	29.6	32.8	
$100,001 - $250,000	1	3.0	5.6	172	14.3	23.8	4	15.4	13.2	760	30.0	30.6	
$250,001 - $500,000	0	0.0	1.4	0	0.0	11.8	3	11.5	7.4	1,023	40.4	36.6	
Total	33	100.0	100.0	1,201	100.0	100.0	26	100.0	100.0	2,531	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	28	96.6		812	82.5		18	75.0		719	32.8		
$100,001 - $250,000	1	3.4		172	17.5		4	16.7		760	34.7		
$250,001 - $500,000	0	0.0		0	0.0		2	8.3		710	32.4		
Total	29	100.0		984	100.0		24	100.0		2,189	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Belle Fourche, SD

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	7	6.0%	61	2.3%
Moderate	0	0.0%	0	0.0%	18	15.5%	328	12.3%
Low/Moderate Total	0	0.0%	0	0.0%	25	21.6%	389	14.6%
Middle	116	100.0%	2,661	100.0%	27	23.3%	533	20.0%
Upper	0	0.0%	0	0.0%	64	55.2%	1,739	65.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	2,661	100.0%	116	100.0%	2,661	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	13.8%	43	6.2%
Moderate	0	0.0%	0	0.0%	4	13.8%	264	37.9%
Low/Moderate Total	0	0.0%	0	0.0%	8	27.6%	307	44.0%
Middle	29	100.0%	697	100.0%	6	20.7%	125	17.9%
Upper	0	0.0%	0	0.0%	15	51.7%	265	38.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	697	100.0%	29	100.0%	697	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	6	30.0%	58	31.0%
Moderate	0	0.0%	0	0.0%	5	25.0%	26	13.9%
Low/Moderate Total	0	0.0%	0	0.0%	11	55.0%	84	44.9%
Middle	20	100.0%	187	100.0%	6	30.0%	51	27.3%
Upper	0	0.0%	0	0.0%	3	15.0%	52	27.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	187	100.0%	20	100.0%	187	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	17	10.3%	162	4.6%
Moderate	0	0.0%	0	0.0%	27	16.4%	618	17.4%
Low/Moderate Total	0	0.0%	0	0.0%	44	26.7%	780	22.0%
Middle	165	100.0%	3,545	100.0%	39	23.6%	709	20.0%
Upper	0	0.0%	0	0.0%	82	49.7%	2,056	58.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	165	100.0%	3,545	100.0%	165	100.0%	3,545	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Belle Fourche, SD

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

	Motor Vehicle							
Low	0	0.0%	0	0.0%	11	12.1%	220	9.6%
Moderate	0	0.0%	0	0.0%	16	17.6%	296	12.9%
Low/Moderate Total	0	0.0%	0	0.0%	27	29.7%	516	22.4%
Middle	91	100.0%	2,299	100.0%	26	28.6%	543	23.6%
Upper	0	0.0%	0	0.0%	37	40.7%	1,224	53.2%
Unknown	0	0.0%	0	0.0%	1	1.1%	16	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	2,299	100.0%	91	100.0%	2,299	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	14.3%	25	4.3%
Moderate	0	0.0%	0	0.0%	4	14.3%	46	7.8%
Low/Moderate Total	0	0.0%	0	0.0%	8	28.6%	71	12.1%
Middle	28	100.0%	586	100.0%	6	21.4%	118	20.1%
Upper	0	0.0%	0	0.0%	12	42.9%	381	65.0%
Unknown	0	0.0%	0	0.0%	2	7.1%	16	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	586	100.0%	28	100.0%	586	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	8.3%	5	3.4%
Moderate	0	0.0%	0	0.0%	2	16.7%	12	8.2%
Low/Moderate Total	0	0.0%	0	0.0%	3	25.0%	17	11.6%
Middle	12	100.0%	146	100.0%	2	16.7%	13	8.9%
Upper	0	0.0%	0	0.0%	7	58.3%	116	79.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	146	100.0%	12	100.0%	146	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	16	12.2%	250	8.2%
Moderate	0	0.0%	0	0.0%	22	16.8%	354	11.7%
Low/Moderate Total	0	0.0%	0	0.0%	38	29.0%	604	19.9%
Middle	131	100.0%	3,031	100.0%	34	26.0%	674	22.2%
Upper	0	0.0%	0	0.0%	56	42.7%	1,721	56.8%
Unknown	0	0.0%	0	0.0%	3	2.3%	32	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	131	100.0%	3,031	100.0%	131	100.0%	3,031	100.0%

2020 Belle Fourche, SD 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	612	24.0
Moderate	0	0.0	0	0.0	0	0.0	393	15.4
Middle	2	100.0	2,548	100.0	148	5.8	625	24.5
Upper	0	0.0	0	0.0	0	0.0	918	36.0

2020 Belle Fourche, SD AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2**	**100.0**	**2,548**	**100.0**	**148**	**5.8**	**2,548**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	4,667	3,046	100.0	65.3	1,033	22.1	588	12.6
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**4,667**	**3,046**	**100.0**	**65.3**	**1,033**	**22.1**	**588**	**12.6**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	540	100.0	496	100.0	35	100.0	9	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**540**	**100.0**	**496**	**100.0**	**35**	**100.0**	**9**	**100.0**
Percentage of Total Businesses:				**91.9**		**6.5**		**1.7**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	90	100.0	90	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**90**	**100.0**	**90**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Bingen, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	65.7	0	0.0	53.0	1	50.0	60.2	207	40.8	45.6	64.3
Upper	0	0.0	34.3	0	0.0	47.0	1	50.0	39.8	300	59.2	54.4	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	507	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	47.4	0	0.0	38.3	3	42.9	46.1	859	41.6	37.2	64.3
Upper	0	0.0	52.6	0	0.0	61.7	4	57.1	53.9	1,208	58.4	62.8	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	7	100.0	100.0	2,067	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	41.5	0	0.0	38.5	0	0.0	45.5	0	0.0	35.9	64.3
Upper	0	0.0	58.5	0	0.0	61.5	3	100.0	54.5	220	100.0	64.1	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	220	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	65.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	35.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	55.8	0	0.0	45.2	4	30.8	50.2	1,066	35.6	39.7	64.3
Upper	0	0.0	44.2	0	0.0	54.8	9	69.2	49.8	1,928	64.4	60.3	35.7

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Bingen, WA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	13	100.0	100.0	2,994	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Bingen, WA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	37.5	0	0.0	25.2	0	0.0	35.5	0	0.0	25.0	64.3
Upper	0	0.0	62.5	0	0.0	74.8	1	100.0	64.5	200	100.0	75.0	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	200	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	38.1	0	0.0	12.0	0	0.0	38.1	0	0.0	25.9	64.3
Upper	0	0.0	61.9	0	0.0	88.0	0	0.0	61.9	0	0.0	74.1	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	80.0	0	0.0	89.0	0	0.0	100.0	0	0.0	100.0	64.3
Upper	0	0.0	20.0	0	0.0	11.0	0	0.0	0.0	0	0.0	0.0	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Bingen, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.3	0	0.0	1.5	0	0.0	2.5	0	0.0	1.1	20.2
Moderate	0	0.0	13.4	0	0.0	8.2	1	50.0	10.2	207	40.8	5.4	19.8
Middle	0	0.0	22.0	0	0.0	17.7	1	50.0	20.9	300	59.2	15.9	21.7
Upper	0	0.0	50.4	0	0.0	64.0	0	0.0	61.3	0	0.0	72.0	38.2
Unknown	0	0.0	10.9	0	0.0	8.6	0	0.0	5.1	0	0.0	5.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	507	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.5	0	0.0	2.9	1	14.3	1.9	193	9.3	0.8	20.2
Moderate	0	0.0	11.7	0	0.0	7.6	3	42.9	9.4	780	37.7	5.7	19.8
Middle	0	0.0	23.7	0	0.0	18.7	1	14.3	16.1	424	20.5	13.6	21.7
Upper	0	0.0	47.1	0	0.0	56.1	2	28.6	51.4	670	32.4	56.2	38.2
Unknown	0	0.0	13.1	0	0.0	14.7	0	0.0	21.2	0	0.0	23.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	7	100.0	100.0	2,067	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.4	0	0.0	2.8	0	0.0	6.8	0	0.0	4.8	20.2
Moderate	0	0.0	7.3	0	0.0	13.2	0	0.0	9.1	0	0.0	4.6	19.8
Middle	0	0.0	29.3	0	0.0	22.0	2	66.7	15.9	120	54.5	12.7	21.7
Upper	0	0.0	58.5	0	0.0	60.5	1	33.3	63.6	100	45.5	68.4	38.2
Unknown	0	0.0	2.4	0	0.0	1.5	0	0.0	4.5	0	0.0	9.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	220	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.5	0	0.0	2.1	1	7.7	2.5	193	6.4	1.0	20.2
Moderate	0	0.0	12.1	0	0.0	7.8	4	30.8	9.4	987	33.0	5.5	19.8
Middle	0	0.0	22.9	0	0.0	18.1	4	30.8	18.0	844	28.2	14.5	21.7
Upper	0	0.0	49.9	0	0.0	60.6	4	30.8	54.5	970	32.4	61.6	38.2
Unknown	0	0.0	11.5	0	0.0	11.4	0	0.0	15.6	0	0.0	17.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	13	100.0	100.0	2,994	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Bingen, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	3.2	0	0.0	1.4	20.2
Moderate	0	0.0	12.5	0	0.0	2.4	0	0.0	3.2	0	0.0	0.5	19.8
Middle	0	0.0	18.8	0	0.0	14.8	0	0.0	32.3	0	0.0	21.5	21.7
Upper	0	0.0	68.8	0	0.0	82.9	1	100.0	58.1	200	100.0	72.2	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	3.2	0	0.0	4.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	200	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	9.5	0	0.0	2.5	20.2
Moderate	0	0.0	9.5	0	0.0	4.0	0	0.0	9.5	0	0.0	4.4	19.8
Middle	0	0.0	23.8	0	0.0	20.0	0	0.0	23.8	0	0.0	17.8	21.7
Upper	0	0.0	61.9	0	0.0	70.6	0	0.0	42.9	0	0.0	53.0	38.2
Unknown	0	0.0	4.8	0	0.0	5.4	0	0.0	14.3	0	0.0	22.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	38.2
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Bingen, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	16.7	45.4	8	1.2	61.6	8	19.5	48.6	380	20.3	47.4	56.5
Upper	5	83.3	45.2	685	98.8	34.3	33	80.5	48.1	1,489	79.7	49.9	43.5

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Bingen, WA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	9.4	0	0.0	4.1	0	0.0	3.2	0	0.0	2.7	
Total	6	100.0	100.0	693	100.0	100.0	41	100.0	100.0	1,869	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Bingen, WA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	50.0	52.5	78	11.3	30.4	3	7.3	45.4	19	1.0	27.6	92.3
Over $1 Million	3	50.0		615	88.7		0	0.0		0	0.0		5.3
Revenue Unknown	0	0.0		0	0.0		38	92.7		1,850	99.0		2.4
Total	6	100.0		693	100.0		41	100.0		1,869	100.0		100.0
By Loan Size													
$100,000 or Less	4	66.7	92.9	168	24.2	33.9	36	87.8	92.3	760	40.7	36.6	
$100,001 - $250,000	1	16.7	3.3	225	32.5	13.6	3	7.3	3.5	456	24.4	10.3	
$250,001 - $1 Million	1	16.7	3.8	300	43.3	52.5	2	4.9	4.2	653	34.9	53.1	
Total	6	100.0	100.0	693	100.0	100.0	41	100.0	100.0	1,869	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	100.0		78	100.0		3	100.0		19	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	3	100.0		78	100.0		3	100.0		19	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Bingen, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	82.7	270	100.0	91.1	0	0.0	77.1	0	0.0	87.1	72.7
Upper	0	0.0	15.4	0	0.0	6.2	0	0.0	16.7	0	0.0	7.8	27.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	2.7	0	0.0	6.3	0	0.0	5.1	
Total	2	100.0	100.0	270	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Bingen, WA

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	100.0	61.5	270	100.0	75.2	0	0.0	58.3	0	0.0	39.2	93.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.8
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.2
Total	2	100.0		270	100.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	1	50.0	76.9	90	33.3	28.8	0	0.0	77.1	0	0.0	21.1	
$100,001 - $250,000	1	50.0	15.4	180	66.7	33.4	0	0.0	16.7	0	0.0	44.2	
$250,001 - $500,000	0	0.0	7.7	0	0.0	37.8	0	0.0	6.3	0	0.0	34.7	
Total	2	100.0	100.0	270	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	50.0		90	33.3		0	0.0		0	0.0		
$100,001 - $250,000	1	50.0		180	66.7		0	0.0		0	0.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Bingen, WA													
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	2	100.0		270	100.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Bingen, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	25	62.5%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	25	62.5%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	100.0%	40	100.0%	1	50.0%	15	37.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	40	100.0%	2	100.0%	40	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	20.0%	17	13.4%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Low/Moderate Total	0	0.0%	0	0.0%	1	20.0%	17	13.4%
Middle	4	80.0%	97	76.4%	0	0.0%	0	0.0%
Upper	1	20.0%	30	23.6%	4	80.0%	110	86.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	127	100.0%	5	100.0%	127	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	14.3%	17	10.2%
Moderate	0	0.0%	0	0.0%	1	14.3%	25	15.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	28.6%	42	25.1%
Middle	4	57.1%	97	58.1%	0	0.0%	0	0.0%
Upper	3	42.9%	70	41.9%	5	71.4%	125	74.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	167	100.0%	7	100.0%	167	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Bingen, WA

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	74	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	74	100.0%

Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	74	100.0%	2	100.0%	74	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	30	100.0%	1	100.0%	30	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	30	100.0%	1	100.0%	30	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	74	71.2%	0	0.0%	0	0.0%
Upper	1	33.3%	30	28.8%	3	100.0%	104	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	104	100.0%	3	100.0%	104	100.0%

2020 Bingen, WA 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	1,068	20.2
Moderate	0	0.0	0	0.0	0	0.0	1,046	19.8
Middle	2	66.7	3,483	66.0	444	12.7	1,148	21.7
Upper	1	33.3	1,798	34.0	130	7.2	2,019	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**5,281**	**100.0**	**574**	**10.9**	**5,281**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,201	3,467	64.3	55.9	1,566	25.3	1,168	18.8
Upper	3,693	1,928	35.7	52.2	902	24.4	863	23.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**9,894**	**5,395**	**100.0**	**54.5**	**2,468**	**24.9**	**2,031**	**20.5**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	558	56.5	512	56.1	30	57.7	16	66.7
Upper	430	43.5	400	43.9	22	42.3	8	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**988**	**100.0**	**912**	**100.0**	**52**	**100.0**	**24**	**100.0**
Percentage of Total Businesses:				**92.3**		**5.3**		**2.4**
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	125	72.7	115	71.9	8	80.0	2	100.0
Upper	47	27.3	45	28.1	2	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**172**	**100.0**	**160**	**100.0**	**10**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**93.0**		**5.8**		**1.2**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Cheyenne, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	66	18.9	20.7	11,529	13.6	16.1	58	15.6	19.1	11,214	11.2	13.7	22.8
Middle	181	51.9	56.6	44,250	52.3	57.3	213	57.4	59.0	57,610	57.6	59.9	50.7
Upper	102	29.2	22.7	28,801	34.1	26.6	100	27.0	21.9	31,140	31.2	26.4	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	349	100.0	100.0	84,580	100.0	100.0	371	100.0	100.0	99,964	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Cheyenne, WY MSA

Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	13	8.7	15.2	2,576	7.5	12.4	40	10.1	13.0	9,314	9.3	10.6	22.8
Middle	88	59.1	58.7	19,621	57.2	57.8	194	48.7	55.5	46,214	46.3	54.5	50.7
Upper	48	32.2	26.0	12,125	35.3	29.8	164	41.2	31.6	44,385	44.4	34.9	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	34,322	100.0	100.0	398	100.0	100.0	99,913	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	14.3	14.8	383	20.0	15.7	5	10.9	11.8	283	9.7	10.9	22.8
Middle	17	48.6	51.6	736	38.4	44.8	26	56.5	48.7	1,576	54.2	55.5	50.7
Upper	13	37.1	33.5	797	41.6	39.5	15	32.6	39.5	1,048	36.1	33.5	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	1,916	100.0	100.0	46	100.0	100.0	2,907	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.7	0	0.0	3.6	2	100.0	50.0	555	100.0	80.4	26.7
Middle	0	0.0	58.3	0	0.0	79.1	0	0.0	36.4	0	0.0	11.0	57.2
Upper	0	0.0	25.0	0	0.0	17.3	0	0.0	13.6	0	0.0	8.7	16.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	555	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	86	15.2	18.3	14,525	11.8	14.5	110	13.0	15.6	21,560	10.5	14.0	22.8
Middle	304	53.9	57.4	65,742	53.6	57.8	444	52.6	56.6	105,995	51.7	55.3	50.7
Upper	174	30.9	24.4	42,345	34.5	27.7	290	34.4	27.8	77,344	37.7	30.7	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	564	100.0	100.0	122,612	100.0	100.0	844	100.0	100.0	204,899	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Cheyenne, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	8.3	8.0	37	2.3	4.4	4	18.2	9.2	131	9.7	12.4	22.8
Middle	13	54.2	53.3	992	63.0	55.2	9	40.9	53.9	550	40.8	52.1	50.7
Upper	9	37.5	38.7	546	34.7	40.4	9	40.9	36.8	666	49.4	35.5	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	1,575	100.0	100.0	22	100.0	100.0	1,347	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	21.7	0	0.0	19.9	1	20.0	20.5	63	29.6	16.4	22.8
Middle	5	71.4	55.4	143	65.3	56.3	2	40.0	50.0	45	21.1	36.7	50.7
Upper	2	28.6	22.9	76	34.7	23.8	2	40.0	29.5	105	49.3	47.0	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	219	100.0	100.0	5	100.0	100.0	213	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.6	0	0.0	10.1	0	0.0	28.0	0	0.0	15.2	22.8
Middle	0	0.0	75.0	0	0.0	79.5	0	0.0	51.2	0	0.0	60.6	50.7
Upper	0	0.0	11.4	0	0.0	10.4	0	0.0	20.8	0	0.0	24.2	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Cheyenne, WY MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	11	3.2	5.2	1,382	1.6	2.8	21	5.7	5.5	3,032	3.0	2.9	19.5
Moderate	86	24.6	22.6	14,748	17.4	16.5	84	22.6	23.5	17,038	17.0	17.5	18.2
Middle	98	28.1	26.0	22,843	27.0	25.5	110	29.6	25.5	28,883	28.9	25.3	23.1

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Cheyenne, WY MSA

Upper	146	41.8	29.5	44,119	52.2	37.2	147	39.6	28.7	48,954	49.0	36.7	39.3
Unknown	8	2.3	16.8	1,488	1.8	18.1	9	2.4	16.7	2,057	2.1	17.6	0.0
Total	349	100.0	100.0	84,580	100.0	100.0	371	100.0	100.0	99,964	100.0	100.0	100.0
Refinance Loans													
Low	4	2.7	6.1	436	1.3	3.2	16	4.0	3.6	2,428	2.4	2.0	19.5
Moderate	24	16.1	13.7	4,045	11.8	10.2	59	14.8	11.7	11,010	11.0	8.5	18.2
Middle	41	27.5	20.8	9,055	26.4	18.5	87	21.9	17.0	19,887	19.9	15.2	23.1
Upper	73	49.0	30.6	18,296	53.3	34.9	214	53.8	32.3	60,641	60.7	35.7	39.3
Unknown	7	4.7	28.8	2,490	7.3	33.2	22	5.5	35.3	5,947	6.0	38.7	0.0
Total	149	100.0	100.0	34,322	100.0	100.0	398	100.0	100.0	99,913	100.0	100.0	100.0
Home Improvement Loans													
Low	1	2.9	4.5	75	3.9	3.2	2	4.3	3.3	120	4.1	2.1	19.5
Moderate	4	11.4	15.5	201	10.5	13.0	4	8.7	11.8	130	4.5	6.2	18.2
Middle	8	22.9	28.4	411	21.5	27.9	11	23.9	27.0	645	22.2	21.9	23.1
Upper	20	57.1	47.7	1,161	60.6	48.8	29	63.0	52.0	2,012	69.2	54.7	39.3
Unknown	2	5.7	3.9	68	3.5	7.1	0	0.0	5.9	0	0.0	15.0	0.0
Total	35	100.0	100.0	1,916	100.0	100.0	46	100.0	100.0	2,907	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	17	3.0	5.5	1,948	1.6	3.0	40	4.8	4.4	5,610	2.7	2.3	19.5
Moderate	118	20.9	18.8	19,158	15.6	14.0	151	17.9	16.2	28,352	13.9	12.1	18.2
Middle	157	27.8	24.0	32,750	26.7	22.7	212	25.2	20.2	49,531	24.2	19.2	23.1
Upper	254	45.0	30.6	64,672	52.7	36.2	408	48.5	31.2	112,847	55.2	36.0	39.3
Unknown	18	3.2	21.1	4,084	3.3	24.2	31	3.7	28.0	8,004	3.9	30.4	0.0
Total	564	100.0	100.0	122,612	100.0	100.0	842	100.0	100.0	204,344	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Cheyenne, WY MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	1	4.5	9.2	30	2.2	3.4	19.5
Moderate	3	12.5	14.7	154	9.8	14.6	3	13.6	10.5	111	8.2	7.6	18.2
Middle	9	37.5	29.3	426	27.0	29.1	3	13.6	15.8	96	7.1	12.0	23.1
Upper	12	50.0	54.7	995	63.2	53.4	15	68.2	64.5	1,110	82.4	77.0	39.3
Unknown	0	0.0	1.3	0	0.0	2.9	0	0.0	0.0	0	0.0	0.0	0.0
Total	24	100.0	100.0	1,575	100.0	100.0	22	100.0	100.0	1,347	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Cheyenne, WY MSA

Other Purpose Closed/Exempt													
Low	1	14.3	8.4	55	25.1	8.4	0	0.0	13.6	0	0.0	11.0	19.5
Moderate	1	14.3	24.1	10	4.6	25.3	1	20.0	20.5	63	29.6	17.3	18.2
Middle	1	14.3	31.3	15	6.8	26.8	1	20.0	15.9	20	9.4	10.8	23.1
Upper	3	42.9	33.7	101	46.1	38.0	3	60.0	50.0	130	61.0	60.9	39.3
Unknown	1	14.3	2.4	38	17.4	1.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	219	100.0	100.0	5	100.0	100.0	213	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.5
Moderate	0	0.0	2.3	0	0.0	1.7	0	0.0	0.0	0	0.0	0.0	18.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.1
Upper	0	0.0	4.5	0	0.0	8.4	0	0.0	0.0	0	0.0	0.0	39.3
Unknown	0	0.0	93.2	0	0.0	89.9	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Cheyenne, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	11.2	12.1	1,432	19.9	12.5	46	18.6	10.4	2,998	18.4	13.2	15.9
Middle	62	63.3	72.3	3,691	51.2	70.0	147	59.5	75.7	10,095	61.9	75.3	67.0
Upper	25	25.5	14.1	2,084	28.9	16.0	54	21.9	12.9	3,224	19.8	10.2	16.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0.3
Tract-Unk	0	0.0	1.4	0	0.0	1.5	0	0.0	0.9	0	0.0	1.0	
Total	98	100.0	100.0	7,206	100.0	100.0	247	100.0	100.0	16,317	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Cheyenne, WY MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	66	67.3	48.5	3,768	52.3	41.5	48	19.4	48.2	3,342	20.5	31.9	91.0
Over $1 Million	22	22.4		3,046	42.3		21	8.5		2,015	12.3		6.6
Revenue Unknown	10	10.2		393	5.5		178	72.1		10,960	67.2		2.4
Total	98	100.0		7,206	100.0		247	100.0		16,317	100.0		100.0
By Loan Size													
$100,000 or Less	83	84.7	97.0	2,871	39.8	57.6	208	84.2	94.6	5,968	36.6	47.1	
$100,001 - $250,000	9	9.2	1.6	1,469	20.4	10.8	28	11.3	2.8	4,312	26.4	13.3	
$250,001 - $1 Million	6	6.1	1.5	2,866	39.8	31.6	11	4.5	2.6	6,037	37.0	39.6	
Total	98	100.0	100.0	7,206	100.0	100.0	247	100.0	100.0	16,317	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	59	89.4		1,760	46.7		44	91.7		932	27.9		
$100,001 - $250,000	4	6.1		615	16.3		1	2.1		194	5.8		
$250,001 - $1 Million	3	4.5		1,393	37.0		3	6.3		2,216	66.3		
Total	66	100.0		3,768	100.0		48	100.0		3,342	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Cheyenne, WY MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.1	0	0.0	0.4	0	0.0	3.9	0	0.0	11.8	4.0
Middle	4	80.0	87.6	85	98.8	85.1	3	100.0	82.9	243	100.0	70.5	77.4
Upper	1	20.0	7.2	1	1.2	11.2	0	0.0	11.8	0	0.0	14.1	18.6

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Cheyenne, WY MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.1	0	0.0	3.4	0	0.0	1.3	0	0.0	3.6	
Total	5	100.0	100.0	86	100.0	100.0	3	100.0	100.0	243	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Cheyenne, WY MSA													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	4	80.0	51.5	85	98.8	54.8	3	100.0	46.1	243	100.0	57.8	98.9
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.1
Revenue Unknown	1	20.0		1	1.2		0	0.0		0	0.0		0.0
Total	5	100.0		86	100.0		3	100.0		243	100.0		100.0
By Loan Size													
$100,000 or Less	5	100.0	89.7	86	100.0	44.2	2	66.7	88.2	66	27.2	40.0	
$100,001 - $250,000	0	0.0	5.2	0	0.0	21.1	1	33.3	6.6	177	72.8	22.6	
$250,001 - $500,000	0	0.0	5.2	0	0.0	34.8	0	0.0	5.3	0	0.0	37.4	
Total	5	100.0	100.0	86	100.0	100.0	3	100.0	100.0	243	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	4	100.0		85	100.0		2	66.7		66	27.2		
$100,001 - $250,000	0	0.0		0	0.0		1	33.3		177	72.8		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	4	100.0		85	100.0		3	100.0		243	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Cheyenne, WY MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	5	8.1%	81	4.9%
Moderate	18	29.0%	411	24.6%	19	30.6%	392	23.5%
Low/Moderate Total	18	29.0%	411	24.6%	24	38.7%	473	28.4%
Middle	30	48.4%	798	47.8%	13	21.0%	464	27.8%
Upper	14	22.6%	459	27.5%	25	40.3%	731	43.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	1,668	100.0%	62	100.0%	1,668	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	12	15.4%	216	12.8%
Moderate	15	19.2%	401	23.8%	8	10.3%	150	8.9%
Low/Moderate Total	15	19.2%	401	23.8%	20	25.6%	366	21.8%
Middle	49	62.8%	938	55.8%	28	35.9%	570	33.9%
Upper	14	17.9%	343	20.4%	29	37.2%	740	44.0%
Unknown	0	0.0%	0	0.0%	1	1.3%	6	0.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	1,682	100.0%	78	100.0%	1,682	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	11	17.7%	67	7.3%
Moderate	11	17.7%	135	14.7%	17	27.4%	221	24.0%
Low/Moderate Total	11	17.7%	135	14.7%	28	45.2%	288	31.3%
Middle	34	54.8%	448	48.6%	8	12.9%	139	15.1%
Upper	17	27.4%	338	36.7%	25	40.3%	474	51.5%
Unknown	0	0.0%	0	0.0%	1	1.6%	20	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	921	100.0%	62	100.0%	921	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	28	13.9%	364	8.5%
Moderate	44	21.8%	947	22.2%	44	21.8%	763	17.9%
Low/Moderate Total	44	21.8%	947	22.2%	72	35.6%	1,127	26.4%

Middle	113	55.9%	2,184	51.1%	49	24.3%	1,173	27.5%
Upper	45	22.3%	1,140	26.7%	79	39.1%	1,945	45.5%
Unknown	0	0.0%	0	0.0%	2	1.0%	26	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	202	100.0%	4,271	100.0%	202	100.0%	4,271	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Cheyenne, WY MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	8	11.4%	111	6.9%
Moderate	18	25.7%	316	19.7%	17	24.3%	397	24.7%
Low/Moderate Total	18	25.7%	316	19.7%	25	35.7%	508	31.6%
Middle	38	54.3%	899	56.0%	16	22.9%	341	21.2%
Upper	14	20.0%	391	24.3%	27	38.6%	725	45.1%
Unknown	0	0.0%	0	0.0%	2	2.9%	32	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	1,606	100.0%	70	100.0%	1,606	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	5	5.1%	97	3.5%
Moderate	17	17.2%	462	16.9%	13	13.1%	218	8.0%
Low/Moderate Total	17	17.2%	462	16.9%	18	18.2%	315	11.5%
Middle	48	48.5%	1,314	48.0%	15	15.2%	391	14.3%
Upper	34	34.3%	962	35.1%	63	63.6%	1,987	72.6%
Unknown	0	0.0%	0	0.0%	3	3.0%	45	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	99	100.0%	2,738	100.0%	99	100.0%	2,738	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	3	6.1%	33	5.1%
Moderate	12	24.5%	159	24.6%	10	20.4%	104	16.1%
Low/Moderate Total	12	24.5%	159	24.6%	13	26.5%	137	21.2%
Middle	27	55.1%	312	48.2%	17	34.7%	162	25.0%
Upper	10	20.4%	176	27.2%	18	36.7%	347	53.6%
Unknown	0	0.0%	0	0.0%	1	2.0%	1	0.2%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	49	100.0%	647	100.0%	49	100.0%	647	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	16	7.3%	241	4.8%
Moderate	47	21.6%	937	18.8%	40	18.3%	719	14.4%
Low/Moderate Total	47	21.6%	937	18.8%	56	25.7%	960	19.2%
Middle	113	51.8%	2,525	50.6%	48	22.0%	894	17.9%
Upper	58	26.6%	1,529	30.6%	108	49.5%	3,059	61.3%
Unknown	0	0.0%	0	0.0%	6	2.8%	78	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	218	100.0%	4,991	100.0%	218	100.0%	4,991	100.0%

2020 Cheyenne, WY MSA 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	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	**21**	**100.0**	**24,950**	**100.0**	**1,781**	**7.1**	**24,950**	**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	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**41,256**	**25,632**	**100.0**	**62.1**	**11,662**	**28.3**	**3,962**	**9.6**

	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	896	15.9	815	15.9	64	17.3	17	12.4
Middle	3,767	67.0	3,411	66.7	260	70.1	96	70.1
Upper	944	16.8	876	17.1	45	12.1	23	16.8

2020 Cheyenne, WY MSA AA Demographics								
Unknown	17	0.3	14	0.3	2	0.5	1	0.7
Total AA	**5,624**	**100.0**	**5,116**	**100.0**	**371**	**100.0**	**137**	**100.0**
Percentage of Total Businesses:				**91.0**		**6.6**		**2.4**

	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	7	4.0	7	4.0	0	0.0	0	0.0
Middle	137	77.4	135	77.1	2	100.0	0	0.0
Upper	33	18.6	33	18.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**177**	**100.0**	**175**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Coeur dAlene, ID MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	11.4	15.8	4,079	9.8	13.5	27	16.4	15.9	7,477	11.9	13.4	12.8
Middle	93	70.5	73.5	26,297	63.0	70.9	114	69.1	74.1	44,358	70.4	72.7	72.0
Upper	24	18.2	10.7	11,391	27.3	15.6	24	14.5	10.0	11,151	17.7	13.9	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	132	100.0	100.0	41,767	100.0	100.0	165	100.0	100.0	62,986	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	12	16.9	13.4	2,943	15.8	11.4	34	14.9	13.6	7,578	11.5	11.6	12.8
Middle	37	52.1	71.7	7,744	41.7	69.4	132	57.9	72.1	35,165	53.4	69.9	72.0
Upper	22	31.0	14.9	7,884	42.5	19.3	62	27.2	14.3	23,073	35.1	18.4	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	71	100.0	100.0	18,571	100.0	100.0	228	100.0	100.0	65,816	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Coeur dAlene, ID MSA

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	4.5	14.3	50	1.7	12.7	5	12.5	12.5	398	6.3	11.7	12.8
Middle	15	68.2	69.3	1,832	62.8	66.0	24	60.0	68.1	3,812	60.5	65.1	72.0
Upper	6	27.3	16.4	1,033	35.4	21.3	11	27.5	19.4	2,091	33.2	23.2	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	2,915	100.0	100.0	40	100.0	100.0	6,301	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	23.1	0	0.0	14.5	1	20.0	24.0	844	2.0	7.1	34.9
Middle	0	0.0	61.5	0	0.0	79.0	4	80.0	68.0	41,533	98.0	84.8	57.8
Upper	1	100.0	15.4	2,372	100.0	6.5	0	0.0	8.0	0	0.0	8.1	7.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	2,372	100.0	100.0	5	100.0	100.0	42,377	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	32	12.5	14.5	7,440	10.7	12.6	71	15.1	14.2	16,893	9.1	12.0	12.8
Middle	168	65.4	72.2	38,820	55.8	70.3	291	61.9	72.5	128,980	69.7	71.4	72.0
Upper	57	22.2	13.2	23,320	33.5	17.2	108	23.0	13.3	39,062	21.1	16.6	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	257	100.0	100.0	69,580	100.0	100.0	470	100.0	100.0	184,935	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Coeur dAlene, ID MSA

Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	12.9	11.9	368	9.3	8.8	3	10.0	9.5	472	6.6	6.2	12.8
Middle	23	74.2	70.0	2,947	74.5	66.9	17	56.7	73.4	4,112	57.1	72.4	72.0
Upper	4	12.9	18.1	640	16.2	24.2	10	33.3	17.0	2,612	36.3	21.5	15.3

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Coeur dAlene, ID MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	3,955	100.0	100.0	30	100.0	100.0	7,196	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	19.6	0	0.0	17.5	1	50.0	17.0	124	47.9	4.0	12.8
Middle	0	0.0	63.0	0	0.0	59.5	0	0.0	63.0	0	0.0	77.9	72.0
Upper	0	0.0	17.4	0	0.0	23.0	1	50.0	20.0	135	52.1	18.1	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	259	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.9	0	0.0	11.0	0	0.0	16.8	0	0.0	12.1	12.8
Middle	0	0.0	76.3	0	0.0	72.1	0	0.0	69.2	0	0.0	68.2	72.0
Upper	0	0.0	11.9	0	0.0	16.9	0	0.0	14.0	0	0.0	19.7	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Coeur dAlene, ID MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	0.8	2.1	150	0.4	1.0	1	0.6	2.6	80	0.1	1.2	18.0
Moderate	16	12.1	12.4	4,327	10.4	8.4	11	6.7	15.1	2,887	4.6	10.2	20.3
Middle	29	22.0	25.7	6,962	16.7	21.4	40	24.2	25.7	11,589	18.4	21.9	22.7
Upper	86	65.2	47.8	30,328	72.6	57.0	108	65.5	46.7	47,045	74.7	55.9	39.0
Unknown	0	0.0	12.1	0	0.0	12.1	5	3.0	9.9	1,385	2.2	10.8	0.0
Total	132	100.0	100.0	41,767	100.0	100.0	165	100.0	100.0	62,986	100.0	100.0	100.0
Refinance Loans													
Low	1	1.4	4.0	40	0.2	2.2	9	3.9	4.3	1,351	2.1	2.5	18.0
Moderate	8	11.3	12.9	990	5.3	8.8	22	9.6	14.1	4,228	6.4	10.4	20.3
Middle	14	19.7	22.1	2,995	16.1	18.8	38	16.7	20.7	9,150	13.9	18.2	22.7

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Coeur dAlene, ID MSA													
Upper	44	62.0	44.2	13,893	74.8	50.9	142	62.3	41.3	47,070	71.5	47.7	39.0
Unknown	4	5.6	16.8	653	3.5	19.3	17	7.5	19.6	4,017	6.1	21.2	0.0
Total	71	100.0	100.0	18,571	100.0	100.0	228	100.0	100.0	65,816	100.0	100.0	100.0
Home Improvement Loans													
Low	1	4.5	3.4	40	1.4	3.0	2	5.0	4.3	39	0.6	2.5	18.0
Moderate	3	13.6	11.6	280	9.6	9.0	5	12.5	13.0	495	7.9	10.4	20.3
Middle	3	13.6	24.9	165	5.7	20.5	6	15.0	23.5	555	8.8	21.7	22.7
Upper	15	68.2	56.9	2,430	83.4	63.0	27	67.5	56.1	5,212	82.7	61.1	39.0
Unknown	0	0.0	3.3	0	0.0	4.4	0	0.0	3.1	0	0.0	4.2	0.0
Total	22	100.0	100.0	2,915	100.0	100.0	40	100.0	100.0	6,301	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	1.2	3.1	230	0.3	1.6	12	2.6	3.8	1,470	1.0	2.1	18.0
Moderate	31	12.1	12.3	5,736	8.5	8.5	39	8.4	14.2	7,850	5.5	10.2	20.3
Middle	52	20.3	24.0	10,604	15.8	20.1	90	19.4	22.4	21,984	15.4	19.4	22.7
Upper	165	64.5	47.1	49,955	74.3	54.7	302	64.9	43.8	105,852	74.3	51.3	39.0
Unknown	5	2.0	13.5	683	1.0	15.1	22	4.7	15.9	5,402	3.8	17.0	0.0
Total	256	100.0	100.0	67,208	100.0	100.0	465	100.0	100.0	142,558	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Coeur dAlene, ID MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	4.2	0	0.0	2.4	0	0.0	6.5	0	0.0	4.3	18.0
Moderate	4	12.9	9.3	139	3.5	5.8	1	3.3	12.3	240	3.3	7.6	20.3
Middle	6	19.4	25.8	482	12.2	18.9	5	16.7	23.6	555	7.7	13.9	22.7
Upper	20	64.5	59.6	3,304	83.5	72.5	24	80.0	56.1	6,401	89.0	73.1	39.0
Unknown	1	3.2	1.2	30	0.8	0.5	0	0.0	1.5	0	0.0	1.1	0.0
Total	31	100.0	100.0	3,955	100.0	100.0	30	100.0	100.0	7,196	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.5	0	0.0	3.4	0	0.0	5.0	0	0.0	7.3	18.0
Moderate	0	0.0	10.9	0	0.0	6.0	0	0.0	11.0	0	0.0	4.6	20.3
Middle	0	0.0	25.0	0	0.0	14.5	1	50.0	24.0	135	52.1	7.8	22.7
Upper	0	0.0	50.0	0	0.0	64.0	1	50.0	52.0	124	47.9	68.5	39.0
Unknown	0	0.0	7.6	0	0.0	12.1	0	0.0	8.0	0	0.0	11.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	259	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Coeur dAlene, ID MSA

	Purpose Not Applicable												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.7	0	0.0	0.1	18.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.7
Upper	0	0.0	5.1	0	0.0	9.6	0	0.0	0.0	0	0.0	0.0	39.0
Unknown	0	0.0	94.9	0	0.0	90.4	0	0.0	99.3	0	0.0	99.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Coeur dAlene, ID MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	11.7	17.3	2,251	25.5	24.7	72	18.1	20.1	5,288	15.5	26.2	22.0
Middle	50	83.3	68.1	6,473	73.3	67.2	273	68.8	68.1	26,759	78.4	66.2	66.0
Upper	3	5.0	11.8	101	1.1	6.3	52	13.1	10.6	2,089	6.1	6.7	11.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.7	0	0.0	1.7	0	0.0	1.3	0	0.0	0.9	
Total	60	100.0	100.0	8,825	100.0	100.0	397	100.0	100.0	34,136	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Coeur dAlene, ID MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	26	43.3	50.7	3,667	41.6	36.7	43	10.8	52.9	4,006	11.7	33.2	93.4
Over $1 Million	29	48.3		4,751	53.8		26	6.5		4,346	12.7		5.9
Revenue Unknown	5	8.3		407	4.6		328	82.6		25,784	75.5		0.7
Total	60	100.0		8,825	100.0		397	100.0		34,136	100.0		100.0
By Loan Size													
$100,000 or Less	39	65.0	92.2	1,392	15.8	34.5	292	73.6	85.8	9,084	26.6	29.3	
$100,001 - $250,000	10	16.7	3.7	1,835	20.8	14.7	72	18.1	7.4	11,185	32.8	18.5	
$250,001 - $1 Million	11	18.3	4.1	5,598	63.4	50.8	33	8.3	6.7	13,867	40.6	52.2	
Total	60	100.0	100.0	8,825	100.0	100.0	397	100.0	100.0	34,136	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	19	73.1		631	17.2		34	79.1		918	22.9		
$100,001 - $250,000	1	3.8		161	4.4		3	7.0		561	14.0		
$250,001 - $1 Million	6	23.1		2,875	78.4		6	14.0		2,527	63.1		
Total	26	100.0		3,667	100.0		43	100.0		4,006	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Coeur dAlene, ID MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	18.5	0	0.0	13.4	0	0.0	2.0	0	0.0	0.8	8.1
Middle	1	50.0	72.2	250	96.2	82.3	4	100.0	91.8	740	100.0	96.7	74.0
Upper	1	50.0	7.4	10	3.8	2.3	0	0.0	4.1	0	0.0	1.3	17.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Coeur dAlene, ID MSA													
Tract-Unk	0	0.0	1.9	0	0.0	2.0	0	0.0	2.0	0	0.0	1.3	
Total	2	100.0	100.0	260	100.0	100.0	4	100.0	100.0	740	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Coeur dAlene, ID MSA													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	100.0	64.8	260	100.0	80.9	2	50.0	34.7	158	21.4	32.5	96.4
Over $1 Million	0	0.0		0	0.0		2	50.0		582	78.6		3.1
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.4
Total	2	100.0		260	100.0		4	100.0		740	100.0		100.0
By Loan Size													
$100,000 or Less	1	50.0	92.6	10	3.8	51.4	2	50.0	85.7	158	21.4	38.1	
$100,001 - $250,000	1	50.0	3.7	250	96.2	19.6	1	25.0	8.2	225	30.4	25.0	
$250,001 - $500,000	0	0.0	3.7	0	0.0	29.0	1	25.0	6.1	357	48.2	36.9	
Total	2	100.0	100.0	260	100.0	100.0	4	100.0	100.0	740	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	50.0		10	3.8		2	100.0		158	100.0		
$100,001 - $250,000	1	50.0		250	96.2		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	2	100.0		260	100.0		2	100.0		158	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Coeur dAlene, ID MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	8.0%	50	12.7%
Moderate	5	20.0%	58	14.7%	1	4.0%	16	4.1%
Low/Moderate Total	5	20.0%	58	14.7%	3	12.0%	66	16.7%
Middle	17	68.0%	301	76.2%	8	32.0%	117	29.6%
Upper	3	12.0%	36	9.1%	13	52.0%	195	49.4%
Unknown	0	0.0%	0	0.0%	1	4.0%	17	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	395	100.0%	25	100.0%	395	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	10.5%	31	6.5%
Moderate	3	15.8%	115	24.0%	3	15.8%	60	12.5%
Low/Moderate Total	3	15.8%	115	24.0%	5	26.3%	91	19.0%
Middle	13	68.4%	256	53.3%	8	42.1%	208	43.3%
Upper	3	15.8%	109	22.7%	4	21.1%	152	31.7%
Unknown	0	0.0%	0	0.0%	2	10.5%	29	6.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	480	100.0%	19	100.0%	480	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	5	13.2%	40	2.4%
Moderate	3	7.9%	111	6.6%	8	21.1%	187	11.1%
Low/Moderate Total	3	7.9%	111	6.6%	13	34.2%	227	13.5%
Middle	25	65.8%	683	40.5%	6	15.8%	177	10.5%
Upper	10	26.3%	891	52.9%	18	47.4%	1,270	75.4%
Unknown	0	0.0%	0	0.0%	1	2.6%	11	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	38	100.0%	1,685	100.0%	38	100.0%	1,685	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	9	11.0%	121	4.7%
Moderate	11	13.4%	284	11.1%	12	14.6%	263	10.3%
Low/Moderate Total	11	13.4%	284	11.1%	21	25.6%	384	15.0%

Middle	55	67.1%	1,240	48.4%	22	26.8%	502	19.6%
Upper	16	19.5%	1,036	40.5%	35	42.7%	1,617	63.2%
Unknown	0	0.0%	0	0.0%	4	4.9%	57	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	2,560	100.0%	82	100.0%	2,560	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Coeur dAlene, ID MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	5.3%	15	2.3%
Moderate	1	5.3%	15	2.3%	6	31.6%	181	27.5%
Low/Moderate Total	1	5.3%	15	2.3%	7	36.8%	196	29.8%
Middle	15	78.9%	482	73.4%	3	15.8%	98	14.9%
Upper	3	15.8%	160	24.4%	9	47.4%	363	55.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	657	100.0%	19	100.0%	657	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	3.3%	24	1.7%
Moderate	4	13.3%	150	10.4%	3	10.0%	114	7.9%
Low/Moderate Total	4	13.3%	150	10.4%	4	13.3%	138	9.6%
Middle	25	83.3%	1,091	76.0%	3	10.0%	199	13.9%
Upper	1	3.3%	195	13.6%	23	76.7%	1,099	76.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	1,436	100.0%	30	100.0%	1,436	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	3	16.7%	23	2.2%
Moderate	2	11.1%	125	11.9%	0	0.0%	0	0.0%
Low/Moderate Total	2	11.1%	125	11.9%	3	16.7%	23	2.2%
Middle	10	55.6%	472	45.1%	0	0.0%	0	0.0%
Upper	6	33.3%	450	43.0%	14	77.8%	924	88.3%
Unknown	0	0.0%	0	0.0%	1	5.6%	100	9.6%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	1,047	100.0%	18	100.0%	1,047	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	5	7.5%	62	2.0%
Moderate	7	10.4%	290	9.2%	9	13.4%	295	9.4%
Low/Moderate Total	7	10.4%	290	9.2%	14	20.9%	357	11.4%
Middle	50	74.6%	2,045	65.1%	6	9.0%	297	9.5%
Upper	10	14.9%	805	25.6%	46	68.7%	2,386	76.0%
Unknown	0	0.0%	0	0.0%	1	1.5%	100	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	3,140	100.0%	67	100.0%	3,140	100.0%

2020 Coeur dAlene, ID MSA 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	6,979	18.0
Moderate	5	20.0	6,083	15.7	916	15.1	7,841	20.3
Middle	16	64.0	27,069	69.9	2,495	9.2	8,789	22.7
Upper	4	16.0	5,553	14.3	211	3.8	15,096	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**25**	**100.0**	**38,705**	**100.0**	**3,622**	**9.4**	**38,705**	**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	11,256	5,056	12.8	44.9	5,104	45.3	1,096	9.7
Middle	45,004	28,483	72.0	63.3	10,371	23.0	6,150	13.7
Upper	9,012	6,043	15.3	67.1	1,364	15.1	1,605	17.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**65,272**	**39,582**	**100.0**	**60.6**	**16,839**	**25.8**	**8,851**	**13.6**

	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	2,029	22.0	1,882	21.9	140	25.6	7	11.3
Middle	6,080	66.0	5,660	65.8	374	68.5	46	74.2
Upper	1,097	11.9	1,056	12.3	32	5.9	9	14.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0

2020 Coeur dAlene, ID MSA AA Demographics								
Total AA	**9,206**	**100.0**	**8,598**	**100.0**	**546**	**100.0**	**62**	**100.0**
Percentage of Total Businesses:				**93.4**		**5.9**		**0.7**

	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	18	8.1	18	8.4	0	0.0	0	0.0
Middle	165	74.0	158	73.5	6	85.7	1	100.0
Upper	40	17.9	39	18.1	1	14.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**223**	**100.0**	**215**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.4**		**3.1**		**0.4**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Colfax, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.5	0	0.0	0.4	0	0.0	0.5	0	0.0	0.6	0.8
Moderate	0	0.0	3.2	0	0.0	4.1	0	0.0	2.4	0	0.0	2.9	3.0
Middle	1	100.0	36.3	156	100.0	27.6	1	100.0	44.6	156	100.0	33.2	51.7
Upper	0	0.0	60.0	0	0.0	67.8	0	0.0	52.5	0	0.0	63.2	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	156	100.0	100.0	1	100.0	100.0	156	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	2.6	0	0.0	1.0	0	0.0	1.1	0.8
Moderate	0	0.0	2.6	0	0.0	3.0	0	0.0	3.2	0	0.0	4.1	3.0
Middle	0	0.0	43.0	0	0.0	36.4	2	66.7	33.0	525	58.5	26.1	51.7
Upper	0	0.0	52.3	0	0.0	57.9	1	33.3	62.7	373	41.5	68.6	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	898	100.0	100.0	100.0
Home Improvement Loans													

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Colfax, WA													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.8
Moderate	0	0.0	5.8	0	0.0	13.1	0	0.0	5.7	0	0.0	5.6	3.0
Middle	0	0.0	40.4	0	0.0	40.8	1	100.0	48.6	80	100.0	20.2	51.7
Upper	0	0.0	53.8	0	0.0	46.1	0	0.0	45.7	0	0.0	74.3	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	80	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	71.4	0	0.0	35.7	15.8
Moderate	0	0.0	55.6	0	0.0	90.4	0	0.0	14.3	0	0.0	53.4	56.0
Middle	0	0.0	11.1	0	0.0	3.4	0	0.0	0.0	0	0.0	0.0	6.7
Upper	0	0.0	33.3	0	0.0	6.2	0	0.0	14.3	0	0.0	10.9	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.0	0	0.0	0.8	0	0.0	1.1	0	0.0	2.4	0.8
Moderate	0	0.0	3.4	0	0.0	29.9	0	0.0	3.0	0	0.0	5.8	3.0
Middle	2	100.0	37.7	184	100.0	22.3	4	80.0	38.3	761	67.1	28.0	51.7
Upper	0	0.0	57.9	0	0.0	47.0	1	20.0	57.6	373	32.9	63.7	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	184	100.0	100.0	5	100.0	100.0	1,134	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Colfax, WA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.4	0	0.0	2.6	0	0.0	2.0	0	0.0	2.5	0.8
Moderate	0	0.0	1.4	0	0.0	0.8	0	0.0	3.9	0	0.0	5.2	3.0
Middle	1	100.0	28.4	28	100.0	20.9	0	0.0	31.4	0	0.0	22.4	51.7
Upper	0	0.0	68.9	0	0.0	75.7	0	0.0	62.7	0	0.0	70.0	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	28	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Colfax, WA

Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.0
Middle	0	0.0	30.4	0	0.0	28.3	0	0.0	60.0	0	0.0	61.0	51.7
Upper	0	0.0	69.6	0	0.0	71.7	0	0.0	40.0	0	0.0	39.0	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.0
Middle	0	0.0	75.0	0	0.0	60.7	0	0.0	77.8	0	0.0	57.3	51.7
Upper	0	0.0	25.0	0	0.0	39.3	0	0.0	22.2	0	0.0	42.7	44.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Colfax, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.0	0	0.0	1.2	0	0.0	4.1	0	0.0	2.0	21.9
Moderate	1	100.0	14.8	156	100.0	9.4	1	100.0	15.8	156	100.0	10.1	15.1
Middle	0	0.0	20.1	0	0.0	18.0	0	0.0	22.1	0	0.0	19.2	16.6
Upper	0	0.0	49.8	0	0.0	59.1	0	0.0	49.1	0	0.0	60.1	46.5
Unknown	0	0.0	12.3	0	0.0	12.3	0	0.0	9.0	0	0.0	8.7	0.0
Total	1	100.0	100.0	156	100.0	100.0	1	100.0	100.0	156	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.6	0	0.0	2.6	0	0.0	2.1	0	0.0	0.9	21.9
Moderate	0	0.0	8.9	0	0.0	5.3	0	0.0	7.6	0	0.0	5.2	15.1
Middle	0	0.0	23.5	0	0.0	19.6	1	33.3	14.9	251	28.0	12.5	16.6
Upper	0	0.0	45.7	0	0.0	53.0	1	33.3	61.0	373	41.5	67.8	46.5
Unknown	0	0.0	18.2	0	0.0	19.6	1	33.3	14.4	274	30.5	13.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	898	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Colfax, WA

Home Improvement Loans													
Low	0	0.0	5.8	0	0.0	5.4	0	0.0	2.9	0	0.0	1.3	21.9
Moderate	0	0.0	7.7	0	0.0	5.7	1	100.0	14.3	80	100.0	8.7	15.1
Middle	0	0.0	28.8	0	0.0	23.9	0	0.0	5.7	0	0.0	3.6	16.6
Upper	0	0.0	53.8	0	0.0	61.3	0	0.0	77.1	0	0.0	86.4	46.5
Unknown	0	0.0	3.8	0	0.0	3.6	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	80	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.4	0	0.0	1.7	0	0.0	3.0	0	0.0	1.4	21.9
Moderate	1	50.0	12.2	156	84.8	8.0	2	40.0	10.8	236	20.8	7.2	15.1
Middle	1	50.0	21.7	28	15.2	18.8	1	20.0	18.1	251	22.1	15.5	16.6
Upper	0	0.0	49.7	0	0.0	57.3	1	20.0	56.3	373	32.9	64.5	46.5
Unknown	0	0.0	13.0	0	0.0	14.2	1	20.0	11.9	274	24.2	11.4	0.0
Total	2	100.0	100.0	184	100.0	100.0	5	100.0	100.0	1,134	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Colfax, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	2.7	0	0.0	2.1	0	0.0	2.0	0	0.0	1.4	21.9
Moderate	0	0.0	8.1	0	0.0	7.7	0	0.0	5.9	0	0.0	3.2	15.1
Middle	1	100.0	21.6	28	100.0	20.7	0	0.0	31.4	0	0.0	28.3	16.6
Upper	0	0.0	66.2	0	0.0	67.9	0	0.0	60.8	0	0.0	67.2	46.5
Unknown	0	0.0	1.4	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	28	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.7	0	0.0	5.2	0	0.0	10.0	0	0.0	5.9	21.9
Moderate	0	0.0	17.4	0	0.0	8.4	0	0.0	0.0	0	0.0	0.0	15.1
Middle	0	0.0	26.1	0	0.0	29.1	0	0.0	25.0	0	0.0	29.6	16.6
Upper	0	0.0	43.5	0	0.0	44.6	0	0.0	60.0	0	0.0	58.6	46.5
Unknown	0	0.0	4.3	0	0.0	12.7	0	0.0	5.0	0	0.0	5.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Colfax, WA

	Purpose Not Applicable												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	46.5
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Colfax, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.2	0	0.0	2.9	0	0.0	4.3	0	0.0	7.0	4.7
Moderate	0	0.0	7.7	0	0.0	7.4	1	1.4	7.3	23	0.7	8.8	8.4
Middle	3	42.9	36.7	300	46.0	32.5	61	85.9	31.3	2,138	64.2	19.1	44.3
Upper	4	57.1	50.1	352	54.0	55.1	9	12.7	56.2	1,167	35.1	64.4	42.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.3	0	0.0	2.1	0	0.0	0.9	0	0.0	0.5	
Total	7	100.0	100.0	652	100.0	100.0	71	100.0	100.0	3,328	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Colfax, WA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	57.1	57.4	304	46.6	38.2	1	1.4	45.1	25	0.8	29.3	92.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Colfax, WA													
Over $1 Million	3	42.9		348	53.4		3	4.2		765	23.0		6.0
Revenue Unknown	0	0.0		0	0.0		67	94.4		2,538	76.3		2.1
Total	7	100.0		652	100.0		71	100.0		3,328	100.0		100.0
By Loan Size													
$100,000 or Less	4	57.1	90.8	144	22.1	24.1	62	87.3	84.7	1,513	45.5	31.7	
$100,001 - $250,000	3	42.9	3.1	508	77.9	11.8	7	9.9	9.5	939	28.2	22.2	
$250,001 - $1 Million	0	0.0	6.1	0	0.0	64.1	2	2.8	5.8	876	26.3	46.1	
Total	7	100.0	100.0	652	100.0	100.0	71	100.0	100.0	3,328	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	75.0		104	34.2		1	100.0		25	100.0		
$100,001 - $250,000	1	25.0		200	65.8		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	4	100.0		304	100.0		1	100.0		25	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Colfax, WA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.4	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.2
Moderate	0	0.0	0.9	0	0.0	0.0	0	0.0	2.2	0	0.0	0.9	2.0
Middle	27	90.0	83.9	4,659	92.7	89.5	25	92.6	84.6	3,585	95.9	87.9	85.8
Upper	3	10.0	13.5	365	7.3	10.3	2	7.4	12.3	155	4.1	11.2	12.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.3	0	0.0	0.1	0	0.0	0.9	0	0.0	0.1	
Total	30	100.0	100.0	5,024	100.0	100.0	27	100.0	100.0	3,740	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Colfax, WA													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	22	73.3	69.1	3,937	78.4	85.9	25	92.6	63.9	3,270	87.4	84.8	99.0
Over $1 Million	6	20.0		1,007	20.0		2	7.4		470	12.6		0.8
Revenue Unknown	2	6.7		80	1.6		0	0.0		0	0.0		0.2
Total	30	100.0		5,024	100.0		27	100.0		3,740	100.0		100.0
By Loan Size													
$100,000 or Less	11	36.7	65.7	547	10.9	16.3	14	51.9	67.8	663	17.7	19.3	
$100,001 - $250,000	13	43.3	15.2	2,351	46.8	23.4	7	25.9	15.9	1,101	29.4	24.6	
$250,001 - $500,000	6	20.0	19.1	2,126	42.3	60.3	6	22.2	16.3	1,976	52.8	56.1	
Total	30	100.0	100.0	5,024	100.0	100.0	27	100.0	100.0	3,740	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	8	36.4		437	11.1		14	56.0		663	20.3		
$100,001 - $250,000	9	40.9		1,709	43.4		6	24.0		961	29.4		
$250,001 - $500,000	5	22.7		1,791	45.5		5	20.0		1,646	50.3		
Total	22	100.0		3,937	100.0		25	100.0		3,270	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Colfax, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	43	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	43	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	43	100.0%	1	100.0%	43	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	43	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	43	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	43	100.0%	1	100.0%	43	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Colfax, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	22	100.0%	1	100.0%	22	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	22	100.0%	1	100.0%	22	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	29	58.0%	1	33.3%	15	30.0%
Upper	1	33.3%	21	42.0%	2	66.7%	35	70.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	50	100.0%	3	100.0%	50	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Middle	2	50.0%	29	40.3%	1	25.0%	15	20.8%
Upper	2	50.0%	43	59.7%	3	75.0%	57	79.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	72	100.0%	4	100.0%	72	100.0%

2020 Colfax, WA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	2	20.0	326	3.8	159	48.8	1,896	21.9
Moderate	1	10.0	895	10.3	219	24.5	1,307	15.1
Middle	4	40.0	3,658	42.2	332	9.1	1,440	16.6
Upper	3	30.0	3,798	43.8	342	9.0	4,034	46.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**8,677**	**100.0**	**1,052**	**12.1**	**8,677**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	#	**% by unit**	#	**% by unit**
Low	1,893	59	0.8	3.1	1,612	85.2	222	11.7
Moderate	4,011	230	3.0	5.7	2,948	73.5	833	20.8
Middle	6,564	4,001	51.7	61.0	1,756	26.8	807	12.3
Upper	7,240	3,448	44.6	47.6	3,345	46.2	447	6.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**19,708**	**7,738**	**100.0**	**39.3**	**9,661**	**49.0**	**2,309**	**11.7**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	73	4.7	70	4.9	3	3.2	0	0.0
Moderate	130	8.4	116	8.1	13	14.0	1	3.1
Middle	689	44.3	623	43.6	40	43.0	26	81.3
Upper	662	42.6	620	43.4	37	39.8	5	15.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,554**	**100.0**	**1,429**	**100.0**	**93**	**100.0**	**32**	**100.0**
Percentage of Total Businesses:				**92.0**		**6.0**		**2.1**

2020 Colfax, WA AA Demographics								
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	10	2.0	10	2.0	0	0.0	0	0.0
Middle	428	85.8	426	86.2	2	50.0	0	0.0
Upper	60	12.0	57	11.5	2	50.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**499**	**100.0**	**494**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.0**		**0.8**		**0.2**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Custer-Hot Springs, SD

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	18	100.0	100.0	3,795	100.0	100.0	14	100.0	100.0	3,370	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	3,795	100.0	100.0	14	100.0	100.0	3,370	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	13	100.0	100.0	778	100.0	100.0	27	100.0	100.0	5,317	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	778	100.0	100.0	27	100.0	100.0	5,317	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Custer-Hot Springs, SD													
Middle	7	100.0	100.0	738	100.0	100.0	12	100.0	100.0	1,032	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	738	100.0	100.0	12	100.0	100.0	1,032	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	102	100.0	100.0	3	100.0	100.0	460	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	102	100.0	100.0	3	100.0	100.0	460	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	48	100.0	100.0	5,818	100.0	100.0	67	100.0	100.0	10,848	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	48	100.0	100.0	5,818	100.0	100.0	67	100.0	100.0	10,848	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Custer-Hot Springs, SD													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	100.0	100.0	405	100.0	100.0	11	100.0	100.0	669	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	405	100.0	100.0	11	100.0	100.0	669	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Custer-Hot Springs, SD

Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Custer-Hot Springs, SD

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	5.6	7.1	86	2.3	3.1	0	0.0	4.1	0	0.0	2.5	15.6
Moderate	2	11.1	20.0	179	4.7	14.0	3	21.4	17.5	246	7.3	12.2	21.5
Middle	3	16.7	24.6	408	10.8	23.6	5	35.7	24.1	935	27.7	20.7	21.9
Upper	11	61.1	37.5	2,979	78.5	48.4	5	35.7	39.5	2,104	62.4	50.2	41.0
Unknown	1	5.6	10.7	143	3.8	10.9	1	7.1	14.8	85	2.5	14.3	0.0
Total	18	100.0	100.0	3,795	100.0	100.0	14	100.0	100.0	3,370	100.0	100.0	100.0
Refinance Loans													
Low	1	7.7	4.9	20	2.6	2.9	1	3.7	1.3	30	0.6	0.6	15.6
Moderate	3	23.1	17.9	147	18.9	13.2	4	14.8	10.3	505	9.5	6.4	21.5
Middle	4	30.8	17.4	422	54.2	15.5	7	25.9	19.0	1,058	19.9	15.7	21.9
Upper	3	23.1	35.9	95	12.2	41.6	15	55.6	40.0	3,724	70.0	47.2	41.0
Unknown	2	15.4	23.9	94	12.1	26.8	0	0.0	29.5	0	0.0	30.0	0.0
Total	13	100.0	100.0	778	100.0	100.0	27	100.0	100.0	5,317	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Custer-Hot Springs, SD

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	8.3	4.9	50	4.8	1.4	15.6
Moderate	2	28.6	26.9	40	5.4	13.1	2	16.7	19.5	86	8.3	13.2	21.5
Middle	2	28.6	26.9	80	10.8	30.9	6	50.0	29.3	605	58.6	21.3	21.9
Upper	2	28.6	42.3	266	36.0	45.1	3	25.0	43.9	291	28.2	57.4	41.0
Unknown	1	14.3	3.8	352	47.7	10.9	0	0.0	2.4	0	0.0	6.7	0.0
Total	7	100.0	100.0	738	100.0	100.0	12	100.0	100.0	1,032	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	8.5	6.4	216	3.8	3.2	2	3.1	2.5	80	0.8	1.4	15.6
Moderate	9	19.1	19.2	416	7.3	13.5	13	20.3	13.7	1,010	9.7	9.0	21.5
Middle	11	23.4	21.7	1,018	17.8	20.4	20	31.3	21.3	2,684	25.8	17.9	21.9
Upper	18	38.3	36.8	3,452	60.4	45.3	28	43.8	40.1	6,529	62.9	48.7	41.0
Unknown	5	10.6	15.9	614	10.7	17.6	1	1.6	22.3	85	0.8	23.0	0.0
Total	47	100.0	100.0	5,716	100.0	100.0	64	100.0	100.0	10,388	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Custer-Hot Springs, SD

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	22.2	20.0	110	27.2	24.2	0	0.0	0.0	0	0.0	0.0	15.6
Moderate	2	22.2	20.0	50	12.3	11.0	4	36.4	36.4	173	25.9	25.9	21.5
Middle	2	22.2	20.0	108	26.7	23.7	2	18.2	18.2	86	12.9	12.9	21.9
Upper	2	22.2	30.0	112	27.7	35.6	5	45.5	45.5	410	61.3	61.3	41.0
Unknown	1	11.1	10.0	25	6.2	5.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	405	100.0	100.0	11	100.0	100.0	669	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	20.0	0	0.0	17.1	0	0.0	0.0	0	0.0	0.0	15.6
Moderate	0	0.0	10.0	0	0.0	12.1	0	0.0	14.3	0	0.0	32.9	21.5
Middle	0	0.0	20.0	0	0.0	12.4	0	0.0	28.6	0	0.0	37.0	21.9
Upper	0	0.0	40.0	0	0.0	36.8	0	0.0	57.1	0	0.0	30.1	41.0
Unknown	0	0.0	10.0	0	0.0	21.6	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Custer-Hot Springs, SD

Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	15.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	16.7	0	0.0	22.1	0	0.0	0.0	0	0.0	0.0	41.0
Unknown	0	0.0	83.3	0	0.0	77.9	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Custer-Hot Springs, SD

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg				Bank		Agg				
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	42	100.0	97.7	2,276	100.0	98.0	150	100.0	98.4	8,822	100.0	98.8	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.3	0	0.0	2.0	0	0.0	1.6	0	0.0	1.2	
Total	42	100.0	100.0	2,276	100.0	100.0	150	100.0	100.0	8,822	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Custer-Hot Springs, SD

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg				Bank		Agg				
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	33	78.6	53.4	1,889	83.0	66.3	34	22.7	49.7	2,616	29.7	47.1	95.3
Over $1 Million	3	7.1		150	6.6		10	6.7		1,539	17.4		2.2
Revenue Unknown	6	14.3		237	10.4		106	70.7		4,667	52.9		2.6
Total	42	100.0		2,276	100.0		150	100.0		8,822	100.0		100.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Custer-Hot Springs, SD												
By Loan Size												
$100,000 or Less	38	90.5	94.0	1,282	56.3	45.4	128	85.3	88.9	3,386	38.4	32.2
$100,001 - $250,000	3	7.1	3.4	552	24.3	17.4	16	10.7	5.1	2,617	29.7	15.3
$250,001 - $1 Million	1	2.4	2.6	442	19.4	37.3	6	4.0	6.0	2,819	32.0	52.5
Total	42	100.0	100.0	2,276	100.0	100.0	150	100.0	100.0	8,822	100.0	100.0
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	29	87.9		895	47.4		27	79.4		618	23.6	
$100,001 - $250,000	3	9.1		552	29.2		5	14.7		892	34.1	
$250,001 - $1 Million	1	3.0		442	23.4		2	5.9		1,106	42.3	
Total	33	100.0		1,889	100.0		34	100.0		2,616	100.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Custer-Hot Springs, SD													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	83	100.0	99.1	4,735	100.0	100.0	66	100.0	100.0	3,513	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	83	100.0	100.0	4,735	100.0	100.0	66	100.0	100.0	3,513	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Custer-Hot Springs, SD													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	78	94.0	87.3	4,603	97.2	92.2	59	89.4	73.5	3,302	94.0	89.5	98.3
Over $1 Million	1	1.2		35	0.7		1	1.5		15	0.4		1.7
Revenue Unknown	4	4.8		97	2.0		6	9.1		196	5.6		0.0
Total	83	100.0		4,735	100.0		66	100.0		3,513	100.0		100.0
By Loan Size													
$100,000 or Less	69	83.1	83.6	2,260	47.7	42.7	60	90.9	90.8	2,177	62.0	55.1	
$100,001 - $250,000	12	14.5	13.6	1,818	38.4	38.8	4	6.1	5.1	528	15.0	13.4	
$250,001 - $500,000	2	2.4	2.7	657	13.9	18.6	2	3.0	4.1	808	23.0	31.5	
Total	83	100.0	100.0	4,735	100.0	100.0	66	100.0	100.0	3,513	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	64	82.1		2,128	46.2		53	89.8		1,966	59.5		
$100,001 - $250,000	12	15.4		1,818	39.5		4	6.8		528	16.0		
$250,001 - $500,000	2	2.6		657	14.3		2	3.4		808	24.5		
Total	78	100.0		4,603	100.0		59	100.0		3,302	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Custer-Hot Springs, SD

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	38	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	38	100.0%
Middle	1	100.0%	38	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	38	100.0%	1	100.0%	38	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	6	7.9%	88	4.8%
Moderate	0	0.0%	0	0.0%	18	23.7%	395	21.4%
Low/Moderate Total	0	0.0%	0	0.0%	24	31.6%	483	26.2%
Middle	76	100.0%	1,845	100.0%	21	27.6%	419	22.7%
Upper	0	0.0%	0	0.0%	31	40.8%	943	51.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	76	100.0%	1,845	100.0%	76	100.0%	1,845	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	6	24.0%	38	10.6%
Moderate	0	0.0%	0	0.0%	3	12.0%	86	24.1%
Low/Moderate Total	0	0.0%	0	0.0%	9	36.0%	124	34.7%
Middle	25	100.0%	357	100.0%	11	44.0%	143	40.1%
Upper	0	0.0%	0	0.0%	5	20.0%	90	25.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	25	100.0%	357	100.0%	25	100.0%	357	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	14	32.6%	66	14.0%
Moderate	0	0.0%	0	0.0%	13	30.2%	138	29.2%
Low/Moderate Total	0	0.0%	0	0.0%	27	62.8%	204	43.1%
Middle	43	100.0%	473	100.0%	5	11.6%	32	6.8%
Upper	0	0.0%	0	0.0%	11	25.6%	237	50.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	473	100.0%	43	100.0%	473	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	26	17.9%	192	7.1%
Moderate	0	0.0%	0	0.0%	35	24.1%	657	24.2%
Low/Moderate Total	0	0.0%	0	0.0%	61	42.1%	849	31.3%
Middle	145	100.0%	2,713	100.0%	37	25.5%	594	21.9%
Upper	0	0.0%	0	0.0%	47	32.4%	1,270	46.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	145	100.0%	2,713	100.0%	145	100.0%	2,713	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Custer-Hot Springs, SD

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	7	9.6%	93	5.0%
Moderate	0	0.0%	0	0.0%	18	24.7%	489	26.1%
Low/Moderate Total	0	0.0%	0	0.0%	25	34.2%	582	31.1%
Middle	73	100.0%	1,874	100.0%	15	20.5%	401	21.4%
Upper	0	0.0%	0	0.0%	33	45.2%	891	47.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	1,874	100.0%	73	100.0%	1,874	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	10.0%	100	11.0%
Moderate	0	0.0%	0	0.0%	8	20.0%	92	10.1%
Low/Moderate Total	0	0.0%	0	0.0%	12	30.0%	192	21.1%
Middle	40	100.0%	910	100.0%	12	30.0%	200	22.0%
Upper	0	0.0%	0	0.0%	16	40.0%	518	56.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	910	100.0%	40	100.0%	910	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	6	30.0%	81	27.8%
Moderate	0	0.0%	0	0.0%	4	20.0%	40	13.7%
Low/Moderate Total	0	0.0%	0	0.0%	10	50.0%	121	41.6%
Middle	20	100.0%	291	100.0%	4	20.0%	53	18.2%
Upper	0	0.0%	0	0.0%	4	20.0%	86	29.6%
Unknown	0	0.0%	0	0.0%	2	10.0%	31	10.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	291	100.0%	20	100.0%	291	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	17	12.8%	274	8.9%
Moderate	0	0.0%	0	0.0%	30	22.6%	621	20.2%
Low/Moderate Total	0	0.0%	0	0.0%	47	35.3%	895	29.1%

Middle	133	100.0%	3,075	100.0%	31	23.3%	654	21.3%
Upper	0	0.0%	0	0.0%	53	39.8%	1,495	48.6%
Unknown	0	0.0%	0	0.0%	2	1.5%	31	1.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	133	100.0%	3,075	100.0%	133	100.0%	3,075	100.0%

2020 Custer-Hot Springs, SD 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	686	15.6
Moderate	0	0.0	0	0.0	0	0.0	945	21.5
Middle	4	100.0	4,387	100.0	337	7.7	959	21.9
Upper	0	0.0	0	0.0	0	0.0	1,797	41.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**4,387**	**100.0**	**337**	**7.7**	**4,387**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	8,966	5,250	100.0	58.6	1,596	17.8	2,120	23.6
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**8,966**	**5,250**	**100.0**	**58.6**	**1,596**	**17.8**	**2,120**	**23.6**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	971	100.0	925	100.0	21	100.0	25	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**971**	**100.0**	**925**	**100.0**	**21**	**100.0**	**25**	**100.0**
Percentage of Total Businesses:				**95.3**		**2.2**		**2.6**

2020 Custer-Hot Springs, SD AA Demographics								
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	118	100.0	116	100.0	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**118**	**100.0**	**116**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.3**		**1.7**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Cut Bank, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	1.0	0	0.0	3.9	0	0.0	4.5	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	7	100.0	98.6	616	100.0	99.0	2	100.0	96.1	95	100.0	95.5	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	616	100.0	100.0	2	100.0	100.0	95	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	25.0	1.9	50	21.6	0.7	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	223	100.0	100.0	3	75.0	98.1	182	78.4	99.3	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	223	100.0	100.0	4	100.0	100.0	232	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Cut Bank, MT

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	43.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	56.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.8	0	0.0	0.5	1	16.7	4.3	50	15.3	4.1	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	100.0	99.2	939	100.0	99.5	5	83.3	95.7	277	84.7	95.9	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	939	100.0	100.0	6	100.0	100.0	327	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Cut Bank, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Cut Bank, MT													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	56.5	28.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	50.0	0	0.0	43.5	71.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Cut Bank, MT													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	6.8	0	0.0	6.0	1	50.0	3.9	20	21.1	1.2	39.3
Moderate	2	28.6	19.2	257	41.7	15.8	1	50.0	29.4	75	78.9	26.7	17.6
Middle	1	14.3	24.7	55	8.9	22.3	0	0.0	25.5	0	0.0	27.7	14.8
Upper	3	42.9	32.9	222	36.0	40.4	0	0.0	27.5	0	0.0	33.7	28.3
Unknown	1	14.3	16.4	82	13.3	15.4	0	0.0	13.7	0	0.0	10.6	0.0
Total	7	100.0	100.0	616	100.0	100.0	2	100.0	100.0	95	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.9	0	0.0	2.2	1	25.0	5.8	15	6.5	1.8	39.3
Moderate	0	0.0	14.6	0	0.0	9.4	1	25.0	7.7	67	28.9	7.6	17.6
Middle	0	0.0	22.0	0	0.0	22.9	0	0.0	23.1	0	0.0	20.9	14.8

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Cut Bank, MT													
Upper	2	100.0	36.6	223	100.0	37.8	2	50.0	26.9	150	64.7	25.2	28.3
Unknown	0	0.0	22.0	0	0.0	27.7	0	0.0	36.5	0	0.0	44.5	0.0
Total	2	100.0	100.0	223	100.0	100.0	4	100.0	100.0	232	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	39.3
Moderate	1	50.0	25.0	80	80.0	55.2	0	0.0	66.7	0	0.0	36.5	17.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.8
Upper	1	50.0	75.0	20	20.0	44.8	0	0.0	33.3	0	0.0	63.5	28.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	100	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.5	0	0.0	4.5	2	33.3	5.2	35	10.7	1.7	39.3
Moderate	3	27.3	18.5	337	35.9	14.2	2	33.3	20.7	142	43.4	17.3	17.6
Middle	1	9.1	22.6	55	5.9	22.0	0	0.0	21.6	0	0.0	22.7	14.8
Upper	6	54.5	34.7	465	49.5	38.8	2	33.3	26.7	150	45.9	29.0	28.3
Unknown	1	9.1	17.7	82	8.7	20.4	0	0.0	25.9	0	0.0	29.4	0.0
Total	11	100.0	100.0	939	100.0	100.0	6	100.0	100.0	327	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Cut Bank, MT													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	39.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	84.8	17.6
Middle	0	0.0	50.0	0	0.0	54.5	0	0.0	0.0	0	0.0	0.0	14.8
Upper	0	0.0	50.0	0	0.0	45.5	0	0.0	50.0	0	0.0	15.2	28.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	33.3	0	0.0	23.5	0	0.0	25.0	0	0.0	15.7	39.3
Moderate	0	0.0	66.7	0	0.0	76.5	0	0.0	50.0	0	0.0	25.2	17.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	25.0	0	0.0	59.1	28.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Cut Bank, MT

Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	39.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	28.3
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Cut Bank, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	4	13.8	7.6	101	6.4	4.1	9	16.7	4.9	1,105	42.3	12.2	26.2
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	25	86.2	92.4	1,466	93.6	95.9	45	83.3	95.1	1,507	57.7	87.8	73.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	1,567	100.0	100.0	54	100.0	100.0	2,612	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Cut Bank, MT

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	22	75.9	47.3	854	54.5	30.7	21	38.9	51.9	1,688	64.6	36.7	89.3

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Cut Bank, MT													
Over $1 Million	4	13.8		636	40.6		3	5.6		111	4.2		8.6
Revenue Unknown	3	10.3		77	4.9		30	55.6		813	31.1		2.1
Total	29	100.0		1,567	100.0		54	100.0		2,612	100.0		100.0
By Loan Size													
$100,000 or Less	26	89.7	92.4	884	56.4	41.7	50	92.6	90.7	1,329	50.9	35.3	
$100,001 - $250,000	2	6.9	4.6	303	19.3	16.2	3	5.6	6.0	373	14.3	20.2	
$250,001 - $1 Million	1	3.4	3.1	380	24.3	42.1	1	1.9	3.3	910	34.8	44.5	
Total	29	100.0	100.0	1,567	100.0	100.0	54	100.0	100.0	2,612	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	21	95.5		724	84.8		18	85.7		509	30.2		
$100,001 - $250,000	1	4.5		130	15.2		2	9.5		269	15.9		
$250,001 - $1 Million	0	0.0		0	0.0		1	4.8		910	53.9		
Total	22	100.0		854	100.0		21	100.0		1,688	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Cut Bank, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	6.7	1.6	58	2.2	0.5	2	8.3	3.5	66	3.1	1.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	28	93.3	98.4	2,628	97.8	99.5	22	91.7	96.5	2,080	96.9	99.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	2,686	100.0	100.0	24	100.0	100.0	2,146	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Cut Bank, MT													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	20	66.7	77.8	1,617	60.2	80.3	15	62.5	77.0	1,016	47.3	82.3	96.8
Over $1 Million	7	23.3		1,019	37.9		6	25.0		1,079	50.3		3.2
Revenue Unknown	3	10.0		50	1.9		3	12.5		51	2.4		0.0
Total	30	100.0		2,686	100.0		24	100.0		2,146	100.0		100.0
By Loan Size													
$100,000 or Less	22	73.3	74.6	722	26.9	24.2	17	70.8	62.8	491	22.9	16.1	
$100,001 - $250,000	5	16.7	14.3	873	32.5	28.5	4	16.7	16.8	459	21.4	23.1	
$250,001 - $500,000	3	10.0	11.1	1,091	40.6	47.3	3	12.5	20.4	1,196	55.7	60.8	
Total	30	100.0	100.0	2,686	100.0	100.0	24	100.0	100.0	2,146	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	16	80.0		431	26.7		12	80.0		385	37.9		
$100,001 - $250,000	2	10.0		391	24.2		2	13.3		231	22.7		
$250,001 - $500,000	2	10.0		795	49.2		1	6.7		400	39.4		
Total	20	100.0		1,617	100.0		15	100.0		1,016	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Cut Bank, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	12	26.1%	314	24.0%	3	6.5%	22	1.7%
Moderate	0	0.0%	0	0.0%	10	21.7%	258	19.7%
Low/Moderate Total	12	26.1%	314	24.0%	13	28.3%	280	21.4%
Middle	34	73.9%	996	76.0%	13	28.3%	333	25.4%
Upper	0	0.0%	0	0.0%	20	43.5%	697	53.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	1,310	100.0%	46	100.0%	1,310	100.0%
	Other - Secured							
Low	4	23.5%	46	12.4%	2	11.8%	23	6.2%
Moderate	0	0.0%	0	0.0%	5	29.4%	113	30.5%
Low/Moderate Total	4	23.5%	46	12.4%	7	41.2%	136	36.7%
Middle	13	76.5%	325	87.6%	4	23.5%	52	14.0%
Upper	0	0.0%	0	0.0%	6	35.3%	183	49.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	371	100.0%	17	100.0%	371	100.0%
	Other - Unsecured							
Low	3	20.0%	12	10.9%	5	33.3%	30	27.3%
Moderate	0	0.0%	0	0.0%	5	33.3%	37	33.6%
Low/Moderate Total	3	20.0%	12	10.9%	10	66.7%	67	60.9%
Middle	12	80.0%	98	89.1%	1	6.7%	2	1.8%
Upper	0	0.0%	0	0.0%	3	20.0%	31	28.2%
Unknown	0	0.0%	0	0.0%	1	6.7%	10	9.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	110	100.0%	15	100.0%	110	100.0%
	Consumer Loan Totals							
Low	19	24.4%	372	20.8%	10	12.8%	75	4.2%
Moderate	0	0.0%	0	0.0%	20	25.6%	408	22.8%
Low/Moderate Total	19	24.4%	372	20.8%	30	38.5%	483	27.0%
Middle	59	75.6%	1,419	79.2%	18	23.1%	387	21.6%
Upper	0	0.0%	0	0.0%	29	37.2%	911	50.9%
Unknown	0	0.0%	0	0.0%	1	1.3%	10	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	1,791	100.0%	78	100.0%	1,791	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Cut Bank, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	9	20.0%	154	14.8%	7	15.6%	105	10.1%
Moderate	0	0.0%	0	0.0%	5	11.1%	71	6.8%
Low/Moderate Total	9	20.0%	154	14.8%	12	26.7%	176	17.0%
Middle	36	80.0%	884	85.2%	10	22.2%	270	26.0%
Upper	0	0.0%	0	0.0%	23	51.1%	592	57.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	45	100.0%	1,038	100.0%	45	100.0%	1,038	100.0%
	Other - Secured							
Low	3	23.1%	55	24.1%	3	23.1%	46	20.2%
Moderate	0	0.0%	0	0.0%	2	15.4%	30	13.2%
Low/Moderate Total	3	23.1%	55	24.1%	5	38.5%	76	33.3%
Middle	10	76.9%	173	75.9%	4	30.8%	101	44.3%
Upper	0	0.0%	0	0.0%	4	30.8%	51	22.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	228	100.0%	13	100.0%	228	100.0%
	Other - Unsecured							
Low	2	18.2%	22	15.5%	2	18.2%	5	3.5%
Moderate	0	0.0%	0	0.0%	2	18.2%	12	8.5%
Low/Moderate Total	2	18.2%	22	15.5%	4	36.4%	17	12.0%
Middle	9	81.8%	120	84.5%	3	27.3%	56	39.4%
Upper	0	0.0%	0	0.0%	3	27.3%	57	40.1%
Unknown	0	0.0%	0	0.0%	1	9.1%	12	8.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	142	100.0%	11	100.0%	142	100.0%
	Consumer Loan Totals							
Low	14	20.3%	231	16.4%	12	17.4%	156	11.1%
Moderate	0	0.0%	0	0.0%	9	13.0%	113	8.0%
Low/Moderate Total	14	20.3%	231	16.4%	21	30.4%	269	19.1%

Middle	55	79.7%	1,177	83.6%	17	24.6%	427	30.3%
Upper	0	0.0%	0	0.0%	30	43.5%	700	49.7%
Unknown	0	0.0%	0	0.0%	1	1.4%	12	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	69	100.0%	1,408	100.0%	69	100.0%	1,408	100.0%

2020 Cut Bank, MT AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	33.3	1,018	37.3	442	43.4	1,074	39.3
Moderate	0	0.0	0	0.0	0	0.0	481	17.6
Middle	2	66.7	1,714	62.7	305	17.8	403	14.8
Upper	0	0.0	0	0.0	0	0.0	774	28.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**2,732**	**100.0**	**747**	**27.3**	**2,732**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,833	691	28.1	37.7	950	51.8	192	10.5
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,443	1,771	71.9	51.4	799	23.2	873	25.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**5,276**	**2,462**	**100.0**	**46.7**	**1,749**	**33.2**	**1,065**	**20.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	125	26.2	104	24.4	16	39.0	5	50.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	352	73.8	322	75.6	25	61.0	5	50.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**477**	**100.0**	**426**	**100.0**	**41**	**100.0**	**10**	**100.0**
Percentage of Total Businesses:				**89.3**		**8.6**		**2.1**

2020 Cut Bank, MT AA Demographics								
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	62	100.0	60	100.0	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**62**	**100.0**	**60**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.8**		**3.2**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Ennis, MT													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	100.0	100.0	2,151	100.0	100.0	13	100.0	100.0	5,278	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	2,151	100.0	100.0	13	100.0	100.0	5,278	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	9	100.0	100.0	2,086	100.0	100.0	19	100.0	100.0	4,962	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	2,086	100.0	100.0	19	100.0	100.0	4,962	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Ennis, MT													
Middle	5	100.0	100.0	330	100.0	100.0	5	100.0	100.0	1,106	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	330	100.0	100.0	5	100.0	100.0	1,106	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	24	100.0	100.0	4,585	100.0	100.0	37	100.0	100.0	11,346	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	4,585	100.0	100.0	37	100.0	100.0	11,346	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Ennis, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	18	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	18	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Ennis, MT

Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Ennis, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.2	0	0.0	0.6	0	0.0	3.1	0	0.0	0.3	18.5
Moderate	2	22.2	9.4	334	15.5	2.0	0	0.0	8.5	0	0.0	1.5	18.8
Middle	1	11.1	11.2	369	17.2	3.1	2	15.4	11.6	548	10.4	2.8	23.0
Upper	5	55.6	57.4	1,272	59.1	68.6	10	76.9	68.0	4,607	87.3	75.6	39.6
Unknown	1	11.1	19.7	176	8.2	25.7	1	7.7	8.9	123	2.3	19.8	0.0
Total	9	100.0	100.0	2,151	100.0	100.0	13	100.0	100.0	5,278	100.0	100.0	100.0
Refinance Loans													
Low	2	22.2	2.8	130	6.2	0.9	2	10.5	3.2	277	5.6	0.5	18.5
Moderate	2	22.2	8.9	441	21.1	1.1	2	10.5	6.7	253	5.1	1.3	18.8
Middle	0	0.0	17.9	0	0.0	3.4	3	15.8	14.9	696	14.0	4.0	23.0
Upper	3	33.3	50.8	1,272	61.0	59.5	12	63.2	58.2	3,736	75.3	70.1	39.6
Unknown	2	22.2	19.6	243	11.6	35.1	0	0.0	17.0	0	0.0	24.1	0.0
Total	9	100.0	100.0	2,086	100.0	100.0	19	100.0	100.0	4,962	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Ennis, MT

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.5
Moderate	0	0.0	10.5	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	18.8
Middle	1	20.0	10.5	200	60.6	3.9	1	20.0	8.3	16	1.4	0.3	23.0
Upper	4	80.0	78.9	130	39.4	95.0	4	80.0	91.7	1,090	98.6	99.7	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	330	100.0	100.0	5	100.0	100.0	1,106	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	12.5	2.8	148	3.2	0.7	2	5.4	3.4	277	2.4	1.8	18.5
Moderate	4	16.7	9.1	775	16.9	1.3	2	5.4	7.1	253	2.2	1.2	18.8
Middle	2	8.3	13.2	569	12.4	2.8	6	16.2	12.9	1,260	11.1	3.0	23.0
Upper	12	50.0	56.6	2,674	58.3	66.3	26	70.3	63.3	9,433	83.1	71.9	39.6
Unknown	3	12.5	18.2	419	9.1	29.0	1	2.7	13.4	123	1.1	22.1	0.0
Total	24	100.0	100.0	4,585	100.0	100.0	37	100.0	100.0	11,346	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Ennis, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	100.0	15.4	18	100.0	0.3	0	0.0	18.2	0	0.0	1.2	18.5
Moderate	0	0.0	15.4	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	18.8
Middle	0	0.0	7.7	0	0.0	0.6	0	0.0	18.2	0	0.0	3.1	23.0
Upper	0	0.0	61.5	0	0.0	98.1	0	0.0	54.5	0	0.0	57.8	39.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	9.1	0	0.0	37.9	0.0
Total	1	100.0	100.0	18	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.2	0	0.0	0.0	0	0.0	4.0	0	0.0	12.8	18.5
Moderate	0	0.0	4.2	0	0.0	0.1	0	0.0	4.0	0	0.0	0.2	18.8
Middle	0	0.0	4.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	23.0
Upper	0	0.0	75.0	0	0.0	76.3	0	0.0	80.0	0	0.0	63.9	39.6
Unknown	0	0.0	12.5	0	0.0	23.4	0	0.0	12.0	0	0.0	23.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Ennis, MT

	Purpose Not Applicable												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.0
Upper	0	0.0	33.3	0	0.0	27.8	0	0.0	0.0	0	0.0	0.0	39.6
Unknown	0	0.0	66.7	0	0.0	72.2	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Ennis, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	23	100.0	83.3	923	100.0	93.6	68	100.0	96.9	4,201	100.0	95.9	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	16.7	0	0.0	6.4	0	0.0	3.1	0	0.0	4.1	
Total	23	100.0	100.0	923	100.0	100.0	68	100.0	100.0	4,201	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Ennis, MT

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	11	47.8	49.0	381	41.3	51.5	9	13.2	47.3	567	13.5	52.3	92.1
Over $1 Million	5	21.7		292	31.6		6	8.8		284	6.8		5.8
Revenue Unknown	7	30.4		250	27.1		53	77.9		3,350	79.7		2.1
Total	23	100.0		923	100.0		68	100.0		4,201	100.0		100.0
By Loan Size													
$100,000 or Less	21	91.3	93.0	680	73.7	37.4	59	86.8	92.0	1,554	37.0	54.2	
$100,001 - $250,000	2	8.7	3.9	243	26.3	18.2	6	8.8	6.7	935	22.3	32.8	
$250,001 - $1 Million	0	0.0	3.1	0	0.0	44.3	3	4.4	1.3	1,712	40.8	12.9	
Total	23	100.0	100.0	923	100.0	100.0	68	100.0	100.0	4,201	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	10	90.9		239	62.7		8	88.9		264	46.6		
$100,001 - $250,000	1	9.1		142	37.3		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		1	11.1		303	53.4		
Total	11	100.0		381	100.0		9	100.0		567	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Ennis, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	95.2	114	100.0	99.6	2	100.0	100.0	93	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Ennis, MT													
Tract-Unk	0	0.0	4.8	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	114	100.0	100.0	2	100.0	100.0	93	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Ennis, MT													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	33.3	68.7	56	49.1	77.8	1	50.0	73.7	63	67.7	84.5	100.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Revenue Unknown	2	66.7		58	50.9		1	50.0		30	32.3		0.0
Total	3	100.0		114	100.0		2	100.0		93	100.0		100.0
By Loan Size													
$100,000 or Less	3	100.0	80.7	114	100.0	37.9	2	100.0	75.4	93	100.0	29.1	
$100,001 - $250,000	0	0.0	13.3	0	0.0	30.7	0	0.0	14.0	0	0.0	31.0	
$250,001 - $500,000	0	0.0	6.0	0	0.0	31.4	0	0.0	10.5	0	0.0	39.9	
Total	3	100.0	100.0	114	100.0	100.0	2	100.0	100.0	93	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		56	100.0		1	100.0		63	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		56	100.0		1	100.0		63	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Ennis, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	3.0%	27	3.6%
Moderate	0	0.0%	0	0.0%	7	21.2%	98	13.2%
Low/Moderate Total	0	0.0%	0	0.0%	8	24.2%	125	16.9%
Middle	33	100.0%	741	100.0%	5	15.2%	81	10.9%
Upper	0	0.0%	0	0.0%	20	60.6%	535	72.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	741	100.0%	33	100.0%	741	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	17.6%	19	7.4%
Low/Moderate Total	0	0.0%	0	0.0%	3	17.6%	19	7.4%
Middle	17	100.0%	257	100.0%	9	52.9%	165	64.2%
Upper	0	0.0%	0	0.0%	5	29.4%	73	28.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	257	100.0%	17	100.0%	257	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	16.7%	5	5.9%
Moderate	0	0.0%	0	0.0%	6	50.0%	26	30.6%
Low/Moderate Total	0	0.0%	0	0.0%	8	66.7%	31	36.5%
Middle	12	100.0%	85	100.0%	2	16.7%	37	43.5%
Upper	0	0.0%	0	0.0%	1	8.3%	7	8.2%
Unknown	0	0.0%	0	0.0%	1	8.3%	10	11.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	85	100.0%	12	100.0%	85	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	3	4.8%	32	3.0%
Moderate	0	0.0%	0	0.0%	16	25.8%	143	13.2%
Low/Moderate Total	0	0.0%	0	0.0%	19	30.6%	175	16.2%

Middle	62	100.0%	1,083	100.0%	16	25.8%	283	26.1%
Upper	0	0.0%	0	0.0%	26	41.9%	615	56.8%
Unknown	0	0.0%	0	0.0%	1	1.6%	10	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	62	100.0%	1,083	100.0%	62	100.0%	1,083	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Ennis, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	4	19.0%	64	12.5%
Moderate	0	0.0%	0	0.0%	5	23.8%	152	29.8%
Low/Moderate Total	0	0.0%	0	0.0%	9	42.9%	216	42.4%
Middle	21	100.0%	510	100.0%	7	33.3%	183	35.9%
Upper	0	0.0%	0	0.0%	5	23.8%	111	21.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	510	100.0%	21	100.0%	510	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	15.4%	38	7.2%
Moderate	0	0.0%	0	0.0%	3	11.5%	64	12.1%
Low/Moderate Total	0	0.0%	0	0.0%	7	26.9%	102	19.3%
Middle	26	100.0%	528	100.0%	7	26.9%	147	27.8%
Upper	0	0.0%	0	0.0%	11	42.3%	274	51.9%
Unknown	0	0.0%	0	0.0%	1	3.8%	5	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	528	100.0%	26	100.0%	528	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	16.7%	5	16.7%
Low/Moderate Total	0	0.0%	0	0.0%	1	16.7%	5	16.7%
Middle	6	100.0%	30	100.0%	3	50.0%	14	46.7%
Upper	0	0.0%	0	0.0%	2	33.3%	11	36.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	30	100.0%	6	100.0%	30	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	8	15.1%	102	9.6%
Moderate	0	0.0%	0	0.0%	9	17.0%	221	20.7%
Low/Moderate Total	0	0.0%	0	0.0%	17	32.1%	323	30.2%
Middle	53	100.0%	1,068	100.0%	17	32.1%	344	32.2%
Upper	0	0.0%	0	0.0%	18	34.0%	396	37.1%
Unknown	0	0.0%	0	0.0%	1	1.9%	5	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	1,068	100.0%	53	100.0%	1,068	100.0%

2020 Ennis, MT 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	369	18.5
Moderate	0	0.0	0	0.0	0	0.0	375	18.8
Middle	3	100.0	1,991	100.0	127	6.4	458	23.0
Upper	0	0.0	0	0.0	0	0.0	789	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**1,991**	**100.0**	**127**	**6.4**	**1,991**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,931	2,514	100.0	36.3	855	12.3	3,562	51.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**6,931**	**2,514**	**100.0**	**36.3**	**855**	**12.3**	**3,562**	**51.4**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	569	100.0	524	100.0	33	100.0	12	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0

2020 Ennis, MT AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**569**	**100.0**	**524**	**100.0**	**33**	**100.0**	**12**	**100.0**
Percentage of Total Businesses:				**92.1**		**5.8**		**2.1**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	106	100.0	106	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**106**	**100.0**	**106**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Ephrata, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.8	0	0.0	1.7	0	0.0	2.7	0	0.0	1.6	2.1
Moderate	0	0.0	6.8	0	0.0	6.2	0	0.0	5.3	0	0.0	5.6	6.2
Middle	3	75.0	79.4	575	69.7	78.3	0	0.0	81.4	0	0.0	79.4	78.5
Upper	1	25.0	10.9	250	30.3	13.8	0	0.0	10.6	0	0.0	13.4	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	825	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.1	0	0.0	1.2	0	0.0	1.4	0	0.0	0.8	2.1
Moderate	0	0.0	5.1	0	0.0	4.6	0	0.0	5.0	0	0.0	5.0	6.2
Middle	0	0.0	79.5	0	0.0	78.6	2	66.7	81.2	454	75.2	79.8	78.5
Upper	1	100.0	13.2	217	100.0	15.6	1	33.3	12.5	150	24.8	14.4	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	217	100.0	100.0	3	100.0	100.0	604	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Ephrata, WA

Home Improvement Loans													
Low	0	0.0	3.3	0	0.0	3.1	0	0.0	1.4	0	0.0	0.9	2.1
Moderate	0	0.0	4.1	0	0.0	7.4	0	0.0	5.8	0	0.0	4.9	6.2
Middle	1	50.0	75.2	140	58.3	63.1	3	100.0	73.9	475	100.0	72.8	78.5
Upper	1	50.0	17.4	100	41.7	26.5	0	0.0	18.8	0	0.0	21.4	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	240	100.0	100.0	3	100.0	100.0	475	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	16.7	0	0.0	3.5	0	0.0	16.7	0	0.0	2.4	5.7
Middle	0	0.0	83.3	0	0.0	96.5	0	0.0	83.3	0	0.0	97.6	84.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.5	0	0.0	1.4	0	0.0	2.0	0	0.0	1.1	2.1
Moderate	0	0.0	6.2	0	0.0	5.6	0	0.0	5.3	0	0.0	5.2	6.2
Middle	5	62.5	79.5	846	59.9	79.6	5	83.3	80.9	929	86.1	80.1	78.5
Upper	3	37.5	11.8	567	40.1	13.4	1	16.7	11.9	150	13.9	13.6	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,413	100.0	100.0	6	100.0	100.0	1,079	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Ephrata, WA

Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.9	0	0.0	1.0	0	0.0	2.1	0	0.0	0.8	2.1
Moderate	0	0.0	7.0	0	0.0	6.2	0	0.0	5.2	0	0.0	6.9	6.2
Middle	1	100.0	79.8	131	100.0	81.5	0	0.0	72.2	0	0.0	66.4	78.5
Upper	0	0.0	12.3	0	0.0	11.2	0	0.0	20.6	0	0.0	25.9	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Ephrata, WA													
Total	1	100.0	100.0	131	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.6	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	2.1
Moderate	0	0.0	9.5	0	0.0	14.6	0	0.0	8.8	0	0.0	2.5	6.2
Middle	0	0.0	81.0	0	0.0	81.5	0	0.0	76.5	0	0.0	80.2	78.5
Upper	0	0.0	7.9	0	0.0	3.5	0	0.0	14.7	0	0.0	17.3	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.6	0	0.0	0.9	2.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	11.1	6.2
Middle	0	0.0	89.7	0	0.0	90.8	0	0.0	81.0	0	0.0	79.4	78.5
Upper	0	0.0	10.3	0	0.0	9.2	0	0.0	6.3	0	0.0	8.6	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Ephrata, WA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.7	0	0.0	1.3	0	0.0	3.2	0	0.0	1.8	21.9
Moderate	1	25.0	15.1	128	15.5	10.5	0	0.0	17.8	0	0.0	14.1	19.0
Middle	0	0.0	26.9	0	0.0	24.6	0	0.0	24.2	0	0.0	23.0	22.4
Upper	3	75.0	38.4	697	84.5	48.3	0	0.0	48.2	0	0.0	56.1	36.7
Unknown	0	0.0	16.9	0	0.0	15.4	0	0.0	6.6	0	0.0	5.0	0.0
Total	4	100.0	100.0	825	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.7	0	0.0	4.4	0	0.0	3.0	0	0.0	1.5	21.9
Moderate	0	0.0	10.5	0	0.0	6.6	0	0.0	11.0	0	0.0	7.5	19.0
Middle	0	0.0	20.1	0	0.0	15.8	1	33.3	18.9	215	35.6	16.5	22.4
Upper	1	100.0	41.5	217	100.0	49.3	2	66.7	47.6	389	64.4	54.3	36.7
Unknown	0	0.0	22.2	0	0.0	23.9	0	0.0	19.4	0	0.0	20.2	0.0
Total	1	100.0	100.0	217	100.0	100.0	3	100.0	100.0	604	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Ephrata, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Improvement Loans													
Low	0	0.0	3.3	0	0.0	4.4	0	0.0	5.1	0	0.0	5.2	21.9
Moderate	0	0.0	9.9	0	0.0	7.6	0	0.0	8.7	0	0.0	6.2	19.0
Middle	1	50.0	27.3	140	58.3	26.1	1	33.3	26.1	320	67.4	26.5	22.4
Upper	1	50.0	56.2	100	41.7	58.8	1	33.3	55.8	55	11.6	56.1	36.7
Unknown	0	0.0	3.3	0	0.0	3.1	1	33.3	4.3	100	21.1	5.9	0.0
Total	2	100.0	100.0	240	100.0	100.0	3	100.0	100.0	475	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.6	0	0.0	2.3	0	0.0	3.2	0	0.0	1.7	21.9
Moderate	1	12.5	13.2	128	9.1	9.1	0	0.0	13.9	0	0.0	10.5	19.0
Middle	1	12.5	24.5	140	9.9	21.7	2	33.3	21.3	535	49.6	19.5	22.4
Upper	6	75.0	40.9	1,145	81.0	49.0	3	50.0	47.7	444	41.1	54.8	36.7
Unknown	0	0.0	17.8	0	0.0	17.9	1	16.7	13.9	100	9.3	13.4	0.0
Total	8	100.0	100.0	1,413	100.0	100.0	6	100.0	100.0	1,079	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Ephrata, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	2.6	0	0.0	1.4	0	0.0	5.2	0	0.0	2.9	21.9
Moderate	0	0.0	11.4	0	0.0	7.1	0	0.0	15.5	0	0.0	11.6	19.0
Middle	0	0.0	27.2	0	0.0	25.5	0	0.0	22.7	0	0.0	20.2	22.4
Upper	1	100.0	56.1	131	100.0	64.6	0	0.0	54.6	0	0.0	64.2	36.7
Unknown	0	0.0	2.6	0	0.0	1.4	0	0.0	2.1	0	0.0	1.0	0.0
Total	1	100.0	100.0	131	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.8	0	0.0	2.0	0	0.0	5.9	0	0.0	5.4	21.9
Moderate	0	0.0	14.3	0	0.0	11.8	0	0.0	8.8	0	0.0	6.3	19.0
Middle	0	0.0	19.0	0	0.0	25.3	0	0.0	20.6	0	0.0	14.2	22.4

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Ephrata, WA													
Upper	0	0.0	61.9	0	0.0	60.9	0	0.0	61.8	0	0.0	65.5	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.9	0	0.0	8.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Upper	0	0.0	3.4	0	0.0	16.0	0	0.0	0.0	0	0.0	0.0	36.7
Unknown	0	0.0	96.6	0	0.0	84.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Ephrata, WA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Businesses %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	0	0.0	2.0	0	0.0	2.6	0	0.0	1.5	0	0.0	3.2	2.9
Moderate	0	0.0	7.3	0	0.0	7.4	9	23.1	6.3	1,555	33.3	6.4	6.4
Middle	1	100.0	76.2	100	100.0	80.8	22	56.4	81.3	2,774	59.4	77.0	81.6
Upper	0	0.0	10.7	0	0.0	7.0	8	20.5	9.6	341	7.3	12.6	9.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.8	0	0.0	2.1	0	0.0	1.2	0	0.0	0.7	
Total	1	100.0	100.0	100	100.0	100.0	39	100.0	100.0	4,670	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Ephrata, WA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	49.3	0	0.0	38.4	4	10.3	42.4	991	21.2	22.3	92.0
Over $1 Million	1	100.0		100	100.0		0	0.0		0	0.0		6.7
Revenue Unknown	0	0.0		0	0.0		35	89.7		3,679	78.8		1.3
Total	1	100.0		100	100.0		39	100.0		4,670	100.0		100.0
By Loan Size													
$100,000 or Less	1	100.0	90.5	100	100.0	31.9	27	69.2	84.8	834	17.9	30.3	
$100,001 - $250,000	0	0.0	5.0	0	0.0	19.7	8	20.5	9.2	1,202	25.7	22.4	
$250,001 - $1 Million	0	0.0	4.5	0	0.0	48.4	4	10.3	6.0	2,634	56.4	47.4	
Total	1	100.0	100.0	100	100.0	100.0	39	100.0	100.0	4,670	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		2	50.0		115	11.6		
$100,001 - $250,000	0	0.0		0	0.0		1	25.0		126	12.7		
$250,001 - $1 Million	0	0.0		0	0.0		1	25.0		750	75.7		
Total	0	0.0		0	0.0		4	100.0		991	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Ephrata, WA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.0	0.2
Moderate	2	10.0	16.4	450	13.4	15.3	3	15.0	18.1	930	24.5	18.6	17.6
Middle	13	65.0	60.8	2,161	64.6	67.8	9	45.0	56.3	1,631	43.0	60.6	58.8
Upper	5	25.0	21.6	735	22.0	16.9	8	40.0	24.9	1,236	32.6	20.5	23.4

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Ephrata, WA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.2	0	0.0	0.1	0	0.0	0.5	0	0.0	0.2	
Total	20	100.0	100.0	3,346	100.0	100.0	20	100.0	100.0	3,797	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Ephrata, WA													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	12	60.0	52.3	2,528	75.6	64.5	10	50.0	38.4	1,798	47.4	37.8	93.0
Over $1 Million	8	40.0		818	24.4		9	45.0		1,961	51.6		7.0
Revenue Unknown	0	0.0		0	0.0		1	5.0		38	1.0		0.0
Total	20	100.0		3,346	100.0		20	100.0		3,797	100.0		100.0
By Loan Size													
$100,000 or Less	10	50.0	70.2	711	21.2	15.4	9	45.0	60.3	456	12.0	15.4	
$100,001 - $250,000	6	30.0	14.3	1,035	30.9	27.2	5	25.0	20.6	885	23.3	27.6	
$250,001 - $500,000	4	20.0	15.5	1,600	47.8	57.5	6	30.0	19.1	2,456	64.7	57.0	
Total	20	100.0	100.0	3,346	100.0	100.0	20	100.0	100.0	3,797	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	4	33.3		233	9.2		6	60.0		348	19.4		
$100,001 - $250,000	4	33.3		695	27.5		1	10.0		250	13.9		
$250,001 - $500,000	4	33.3		1,600	63.3		3	30.0		1,200	66.7		
Total	12	100.0		2,528	100.0		10	100.0		1,798	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Ephrata, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	35	100.0%	2	100.0%	35	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	35	100.0%	2	100.0%	35	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	14	26.4%	0	0.0%	0	0.0%
Upper	1	50.0%	39	73.6%	2	100.0%	53	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	53	100.0%	2	100.0%	53	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	102	100.0%	2	66.7%	17	16.7%
Upper	0	0.0%	0	0.0%	1	33.3%	85	83.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	102	100.0%	3	100.0%	102	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Middle	6	85.7%	151	79.5%	4	57.1%	52	27.4%
Upper	1	14.3%	39	20.5%	3	42.9%	138	72.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	190	100.0%	7	100.0%	190	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Ephrata, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	13	35.1%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	13	35.1%
Middle	2	100.0%	37	100.0%	1	50.0%	24	64.9%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	37	100.0%	2	100.0%	37	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	40.0%	100	37.2%	1	20.0%	33	12.3%
Upper	3	60.0%	169	62.8%	4	80.0%	236	87.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	269	100.0%	5	100.0%	269	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	14.3%	13	4.2%
Low/Moderate Total	0	0.0%	0	0.0%	1	14.3%	13	4.2%
Middle	4	57.1%	137	44.8%	2	28.6%	57	18.6%
Upper	3	42.9%	169	55.2%	4	57.1%	236	77.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	306	100.0%	7	100.0%	306	100.0%

2020 Ephrata, WA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	1	6.3	927	4.2	288	31.1	4,816	21.9
Moderate	1	6.3	2,310	10.5	518	22.4	4,189	19.0
Middle	12	75.0	16,767	76.1	1,874	11.2	4,940	22.4
Upper	2	12.5	2,022	9.2	107	5.3	8,081	36.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**16**	**100.0**	**22,026**	**100.0**	**2,787**	**12.7**	**22,026**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	#	**% by unit**	#	**% by unit**
Low	1,493	383	2.1	25.7	1,044	69.9	66	4.4
Moderate	3,462	1,143	6.2	33.0	1,600	46.2	719	20.8
Middle	27,239	14,419	78.5	52.9	8,889	32.6	3,931	14.4
Upper	3,197	2,424	13.2	75.8	456	14.3	317	9.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**35,391**	**18,369**	**100.0**	**51.9**	**11,989**	**33.9**	**5,033**	**14.2**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	85	2.9	67	2.5	17	8.6	1	2.7
Moderate	189	6.4	169	6.2	17	8.6	3	8.1
Middle	2,402	81.6	2,222	82.1	148	74.7	32	86.5
Upper	266	9.0	249	9.2	16	8.1	1	2.7

2020 Ephrata, WA AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,942**	**100.0**	**2,707**	**100.0**	**198**	**100.0**	**37**	**100.0**
Percentage of Total Businesses:				**92.0**		**6.7**		**1.3**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	99	17.6	86	16.5	13	33.3	0	0.0
Middle	330	58.8	311	59.6	19	48.7	0	0.0
Upper	131	23.4	124	23.8	7	17.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**561**	**100.0**	**522**	**100.0**	**39**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**93.0**		**7.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Eugene-Springfield, OR MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.1	0	0.0	1.2	0	0.0	1.0	0	0.0	1.0	0.8
Moderate	2	20.0	19.5	530	15.0	16.8	0	0.0	19.2	0	0.0	16.3	16.9
Middle	4	40.0	56.5	1,490	42.2	55.2	5	83.3	57.2	2,027	83.9	56.4	57.2
Upper	4	40.0	22.8	1,508	42.7	26.8	1	16.7	22.6	388	16.1	26.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	3,528	100.0	100.0	6	100.0	100.0	2,415	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.0	0	0.0	1.1	0	0.0	1.1	0	0.0	1.3	0.8
Moderate	0	0.0	16.3	0	0.0	13.9	0	0.0	14.5	0	0.0	12.2	16.9
Middle	1	50.0	58.3	50	15.2	56.9	6	66.7	57.7	1,623	59.2	55.7	57.2
Upper	1	50.0	24.4	280	84.8	28.1	3	33.3	26.7	1,120	40.8	30.8	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	330	100.0	100.0	9	100.0	100.0	2,743	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Home Improvement Loans													
Low	0	0.0	0.9	0	0.0	1.0	0	0.0	1.1	0	0.0	2.0	0.8
Moderate	1	50.0	17.2	200	80.0	15.1	1	50.0	15.0	25	25.0	12.2	16.9
Middle	1	50.0	56.6	50	20.0	54.6	1	50.0	55.8	75	75.0	52.4	57.2
Upper	0	0.0	25.3	0	0.0	29.3	0	0.0	28.1	0	0.0	33.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	250	100.0	100.0	2	100.0	100.0	100	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	24.1	0	0.0	6.0	1	50.0	18.8	3,790	69.7	11.7	16.4
Moderate	0	0.0	20.7	0	0.0	21.2	0	0.0	23.4	0	0.0	17.7	30.4
Middle	0	0.0	41.4	0	0.0	63.2	0	0.0	45.3	0	0.0	46.8	43.7
Upper	0	0.0	13.8	0	0.0	9.6	1	50.0	12.5	1,650	30.3	23.8	9.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	5,440	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.1	0	0.0	1.4	1	5.0	1.1	3,790	35.2	1.6	0.8
Moderate	3	17.6	17.6	730	16.2	15.6	1	5.0	15.9	25	0.2	13.6	16.9
Middle	8	47.1	57.3	1,775	39.5	56.3	13	65.0	57.4	3,792	35.2	55.4	57.2
Upper	6	35.3	24.0	1,988	44.2	26.7	5	25.0	25.7	3,158	29.3	29.4	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	4,493	100.0	100.0	20	100.0	100.0	10,765	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.7	0	0.0	0.6	0.8
Moderate	0	0.0	13.4	0	0.0	9.8	0	0.0	16.7	0	0.0	13.1	16.9
Middle	2	66.7	57.5	185	48.1	52.0	0	0.0	56.4	0	0.0	52.6	57.2
Upper	1	33.3	28.6	200	51.9	37.9	0	0.0	26.1	0	0.0	33.7	25.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	385	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.6	0	0.0	0.8	0	0.0	1.4	0	0.0	0.9	0.8
Moderate	0	0.0	20.7	0	0.0	16.0	0	0.0	13.9	0	0.0	11.1	16.9
Middle	0	0.0	54.0	0	0.0	47.0	1	100.0	50.0	67	100.0	38.2	57.2
Upper	0	0.0	24.7	0	0.0	36.1	0	0.0	34.7	0	0.0	49.9	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	67	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.9	0	0.0	0.5	0	0.0	0.5	0	0.0	0.5	0.8
Moderate	0	0.0	17.2	0	0.0	13.0	0	0.0	20.6	0	0.0	16.8	16.9
Middle	0	0.0	60.3	0	0.0	57.9	0	0.0	62.7	0	0.0	60.5	57.2
Upper	0	0.0	21.6	0	0.0	28.5	0	0.0	16.3	0	0.0	22.2	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	10.0	2.3	170	4.8	1.2	0	0.0	3.2	0	0.0	1.8	21.4
Moderate	0	0.0	13.8	0	0.0	10.0	0	0.0	17.9	0	0.0	13.8	17.8
Middle	1	10.0	25.6	395	11.2	23.0	3	50.0	27.8	897	37.1	26.3	20.5
Upper	8	80.0	46.3	2,963	84.0	54.4	3	50.0	42.4	1,518	62.9	49.8	40.3
Unknown	0	0.0	12.0	0	0.0	11.4	0	0.0	8.6	0	0.0	8.3	0.0
Total	10	100.0	100.0	3,528	100.0	100.0	6	100.0	100.0	2,415	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.4	0	0.0	2.6	1	11.1	4.0	107	3.9	2.3	21.4
Moderate	0	0.0	12.4	0	0.0	8.9	1	11.1	14.2	280	10.2	10.8	17.8
Middle	0	0.0	21.9	0	0.0	19.3	1	11.1	23.4	245	8.9	21.2	20.5
Upper	1	50.0	41.9	280	84.8	48.1	5	55.6	40.6	1,959	71.4	46.9	40.3

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Unknown	1	50.0	19.5	50	15.2	21.1	1	11.1	17.8	152	5.5	18.8	0.0
Total	2	100.0	100.0	330	100.0	100.0	9	100.0	100.0	2,743	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.0	0	0.0	3.1	0	0.0	5.5	0	0.0	3.0	21.4
Moderate	0	0.0	13.0	0	0.0	10.5	0	0.0	14.9	0	0.0	11.4	17.8
Middle	0	0.0	21.2	0	0.0	19.9	0	0.0	26.0	0	0.0	25.5	20.5
Upper	2	100.0	56.8	250	100.0	60.6	1	50.0	51.1	75	75.0	57.3	40.3
Unknown	0	0.0	5.1	0	0.0	5.9	1	50.0	2.4	25	25.0	2.7	0.0
Total	2	100.0	100.0	250	100.0	100.0	2	100.0	100.0	100	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	5.9	3.4	170	3.8	1.9	1	5.6	3.9	107	2.0	2.2	21.4
Moderate	0	0.0	12.8	0	0.0	9.4	1	5.6	15.0	280	5.3	11.6	17.8
Middle	1	5.9	23.2	395	8.8	20.9	5	27.8	24.5	1,209	22.7	22.7	20.5
Upper	14	82.4	45.8	3,878	86.3	51.8	9	50.0	41.8	3,552	66.7	48.0	40.3
Unknown	1	5.9	14.7	50	1.1	15.9	2	11.1	14.8	177	3.3	15.5	0.0
Total	17	100.0	100.0	4,493	100.0	100.0	18	100.0	100.0	5,325	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Eugene-Springfield, OR MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	3.8	0	0.0	2.8	0	0.0	5.6	0	0.0	4.1	21.4
Moderate	0	0.0	10.8	0	0.0	7.1	0	0.0	10.9	0	0.0	7.6	17.8
Middle	0	0.0	22.2	0	0.0	16.3	0	0.0	26.1	0	0.0	20.8	20.5
Upper	3	100.0	61.1	385	100.0	71.8	0	0.0	55.3	0	0.0	65.0	40.3
Unknown	0	0.0	2.1	0	0.0	2.0	0	0.0	2.1	0	0.0	2.6	0.0
Total	3	100.0	100.0	385	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.9	0	0.0	3.3	0	0.0	7.6	0	0.0	3.5	21.4
Moderate	0	0.0	14.4	0	0.0	10.4	0	0.0	13.2	0	0.0	8.8	17.8
Middle	0	0.0	23.6	0	0.0	16.3	1	100.0	18.1	67	100.0	16.8	20.5
Upper	0	0.0	49.4	0	0.0	63.4	0	0.0	55.6	0	0.0	67.6	40.3
Unknown	0	0.0	5.7	0	0.0	6.7	0	0.0	5.6	0	0.0	3.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	67	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Eugene-Springfield, OR MSA

Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.8
Middle	0	0.0	1.7	0	0.0	0.7	0	0.0	0.5	0	0.0	0.5	20.5
Upper	0	0.0	7.8	0	0.0	13.9	0	0.0	0.5	0	0.0	0.5	40.3
Unknown	0	0.0	90.5	0	0.0	85.4	0	0.0	99.0	0	0.0	99.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Eugene-Springfield, OR MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	1	7.7	5.8	161	7.6	8.0	16	12.5	5.3	1,803	10.7	5.9	5.6
Moderate	4	30.8	24.8	966	45.9	28.6	49	38.3	26.7	5,135	30.4	32.7	24.5
Middle	6	46.2	44.2	934	44.4	43.8	40	31.3	44.9	8,308	49.2	41.0	47.5
Upper	2	15.4	22.3	44	2.1	17.8	23	18.0	22.0	1,640	9.7	19.7	22.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.9	0	0.0	1.8	0	0.0	1.1	0	0.0	0.8	
Total	13	100.0	100.0	2,105	100.0	100.0	128	100.0	100.0	16,886	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Eugene-Springfield, OR MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	11	84.6	50.0	1,855	88.1	34.3	9	7.0	41.0	2,334	13.8	23.7	92.5
Over $1 Million	2	15.4		250	11.9		12	9.4		3,273	19.4		6.7
Revenue Unknown	0	0.0		0	0.0		107	83.6		11,279	66.8		0.8
Total	13	100.0		2,105	100.0		128	100.0		16,886	100.0		100.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Eugene-Springfield, OR MSA													
By Loan Size													
$100,000 or Less	7	53.8	94.4	210	10.0	39.5	92	71.9	86.3	3,437	20.4	30.9	
$100,001 - $250,000	3	23.1	2.6	553	26.3	12.8	17	13.3	7.9	2,484	14.7	19.9	
$250,001 - $1 Million	3	23.1	3.0	1,342	63.8	47.7	19	14.8	5.8	10,965	64.9	49.2	
Total	13	100.0	100.0	2,105	100.0	100.0	128	100.0	100.0	16,886	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	6	54.5		110	5.9		5	55.6		209	9.0		
$100,001 - $250,000	2	18.2		403	21.7		0	0.0		0	0.0		
$250,001 - $1 Million	3	27.3		1,342	72.3		4	44.4		2,125	91.0		
Total	11	100.0		1,855	100.0		9	100.0		2,334	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Eugene-Springfield, OR MSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.4	0	0.0	3.1	1.1
Moderate	0	0.0	17.2	0	0.0	32.9	0	0.0	10.5	0	0.0	12.5	11.8
Middle	0	0.0	44.8	0	0.0	42.6	0	0.0	54.5	0	0.0	56.5	53.8
Upper	0	0.0	32.5	0	0.0	21.6	0	0.0	31.5	0	0.0	26.6	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	5.5	0	0.0	2.9	0	0.0	2.1	0	0.0	1.3	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Eugene-Springfield, OR MSA													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	66.3	0	0.0	41.6	0	0.0	54.5	0	0.0	38.2	95.8
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		4.2
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	92.6	0	0.0	42.6	0	0.0	79.7	0	0.0	28.4	
$100,001 - $250,000	0	0.0	3.7	0	0.0	18.0	0	0.0	11.9	0	0.0	26.5	
$250,001 - $500,000	0	0.0	3.7	0	0.0	39.4	0	0.0	8.4	0	0.0	45.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Eugene-Springfield, OR MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	7.1%	12	3.9%
Moderate	3	21.4%	33	10.7%	3	21.4%	34	11.1%
Low/Moderate Total	3	21.4%	33	10.7%	4	28.6%	46	15.0%
Middle	8	57.1%	195	63.5%	3	21.4%	91	29.6%
Upper	3	21.4%	79	25.7%	7	50.0%	170	55.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	307	100.0%	14	100.0%	307	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	20.0%	9	8.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	20.0%	9	8.0%
Middle	1	20.0%	40	35.7%	0	0.0%	0	0.0%
Upper	4	80.0%	72	64.3%	4	80.0%	103	92.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	112	100.0%	5	100.0%	112	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	4	28.6%	26	12.3%
Moderate	3	21.4%	16	7.5%	0	0.0%	0	0.0%
Low/Moderate Total	3	21.4%	16	7.5%	4	28.6%	26	12.3%
Middle	11	78.6%	196	92.5%	3	21.4%	38	17.9%
Upper	0	0.0%	0	0.0%	7	50.0%	148	69.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	212	100.0%	14	100.0%	212	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	5	15.2%	38	6.0%
Moderate	6	18.2%	49	7.8%	4	12.1%	43	6.8%
Low/Moderate Total	6	18.2%	49	7.8%	9	27.3%	81	12.8%
Middle	20	60.6%	431	68.3%	6	18.2%	129	20.4%
Upper	7	21.2%	151	23.9%	18	54.5%	421	66.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	631	100.0%	33	100.0%	631	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Eugene-Springfield, OR MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	33.3%	38	23.3%	3	50.0%	51	31.3%
Low/Moderate Total	2	33.3%	38	23.3%	3	50.0%	51	31.3%
Middle	3	50.0%	89	54.6%	0	0.0%	0	0.0%
Upper	1	16.7%	36	22.1%	3	50.0%	112	68.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	163	100.0%	6	100.0%	163	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	11.1%	12	4.4%
Moderate	2	22.2%	36	13.1%	1	11.1%	14	5.1%
Low/Moderate Total	2	22.2%	36	13.1%	2	22.2%	26	9.5%
Middle	5	55.6%	222	81.0%	3	33.3%	90	32.8%
Upper	2	22.2%	16	5.8%	4	44.4%	158	57.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	274	100.0%	9	100.0%	274	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	6.7%	35	9.8%
Moderate	0	0.0%	0	0.0%	1	6.7%	7	2.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	13.3%	42	11.7%
Middle	11	73.3%	283	79.1%	3	20.0%	48	13.4%
Upper	4	26.7%	75	20.9%	10	66.7%	268	74.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	15	100.0%	358	100.0%	15	100.0%	358	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	6.7%	47	5.9%
Moderate	4	13.3%	74	9.3%	5	16.7%	72	9.1%
Low/Moderate Total	4	13.3%	74	9.3%	7	23.3%	119	15.0%

Middle	19	63.3%	594	74.7%	6	20.0%	138	17.4%
Upper	7	23.3%	127	16.0%	17	56.7%	538	67.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	30	100.0%	795	100.0%	30	100.0%	795	100.0%

2020 Eugene-Springfield, OR MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	3.4	1,268	1.5	455	35.9	18,558	21.4
Moderate	18	20.7	17,304	20.0	3,357	19.4	15,443	17.8
Middle	45	51.7	48,581	56.1	5,357	11.0	17,724	20.5
Upper	20	23.0	19,492	22.5	1,041	5.3	34,920	40.3
Unknown	1	1.1	0	0.0	0	0.0	0	0.0
Total AA	**87**	**100.0**	**86,645**	**100.0**	**10,210**	**11.8**	**86,645**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	7,244	729	0.8	10.1	5,775	79.7	740	10.2
Moderate	33,253	14,535	16.9	43.7	16,217	48.8	2,501	7.5
Middle	85,667	49,081	57.2	57.3	30,357	35.4	6,229	7.3
Upper	31,346	21,440	25.0	68.4	8,101	25.8	1,805	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**157,510**	**85,785**	**100.0**	**54.5**	**60,450**	**38.4**	**11,275**	**7.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,031	5.6	914	5.3	108	8.7	9	6.1
Moderate	4,553	24.5	4,092	23.8	437	35.0	24	16.3
Middle	8,817	47.5	8,284	48.3	462	37.0	71	48.3
Upper	4,158	22.4	3,875	22.6	240	19.2	43	29.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18,559**	**100.0**	**17,165**	**100.0**	**1,247**	**100.0**	**147**	**100.0**
Percentage of Total Businesses:				**92.5**		**6.7**		**0.8**

2020 Eugene-Springfield, OR MSA AA Demographics								
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7	1.1	7	1.2	0	0.0	0	0.0
Moderate	72	11.8	68	11.6	4	15.4	0	0.0
Middle	329	53.8	313	53.4	16	61.5	0	0.0
Upper	204	33.3	198	33.8	6	23.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**612**	**100.0**	**586**	**100.0**	**26**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.8**		**4.2**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Great Falls, MT MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	9.3	14.6	505	5.8	10.4	4	7.5	15.6	368	3.0	11.0	12.0
Middle	21	48.8	51.6	3,828	44.1	48.6	26	49.1	49.6	5,240	42.7	45.6	56.5
Upper	18	41.9	33.8	4,339	50.0	41.1	23	43.4	34.8	6,676	54.3	43.4	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	8,672	100.0	100.0	53	100.0	100.0	12,284	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	13.5	11.6	601	11.7	7.9	8	8.2	11.0	944	5.1	7.6	12.0
Middle	16	43.2	53.3	2,275	44.3	49.6	42	43.3	49.1	7,317	39.6	46.2	56.5
Upper	16	43.2	35.1	2,263	44.0	42.5	47	48.5	39.9	10,208	55.3	46.2	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	5,139	100.0	100.0	97	100.0	100.0	18,469	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	8.3	10.9	25	3.7	13.7	1	9.1	9.1	125	24.2	10.7	12.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Great Falls, MT MSA													
Middle	9	75.0	62.5	588	88.0	60.1	7	63.6	59.7	291	56.4	58.7	56.5
Upper	2	16.7	26.6	55	8.2	26.2	3	27.3	31.2	100	19.4	30.6	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	668	100.0	100.0	11	100.0	100.0	516	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	33.3	29.4	1,645	34.6	11.9	4	80.0	44.4	1,350	78.0	18.9	38.6
Middle	3	50.0	50.0	2,610	54.9	60.2	1	20.0	29.6	380	22.0	14.9	39.9
Upper	1	16.7	20.6	500	10.5	27.9	0	0.0	25.9	0	0.0	66.2	21.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	4,755	100.0	100.0	5	100.0	100.0	1,730	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	13.6	13.7	2,891	14.3	9.7	17	9.7	13.4	2,787	8.2	9.5	12.0
Middle	54	45.8	52.4	9,529	47.3	49.4	77	44.0	49.2	13,337	39.0	44.9	56.5
Upper	48	40.7	33.9	7,742	38.4	40.9	81	46.3	37.4	18,061	52.8	45.6	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	118	100.0	100.0	20,162	100.0	100.0	175	100.0	100.0	34,185	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Great Falls, MT MSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	20.0	14.0	90	12.5	11.2	0	0.0	10.8	0	0.0	9.3	12.0
Middle	3	20.0	46.5	193	26.9	46.6	1	12.5	48.6	109	15.4	43.4	56.5
Upper	9	60.0	39.5	435	60.6	42.2	7	87.5	40.5	599	84.6	47.3	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	718	100.0	100.0	8	100.0	100.0	708	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Great Falls, MT MSA													
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	15.4	25	11.9	12.4	0	0.0	17.2	0	0.0	12.8	12.0
Middle	2	40.0	55.4	35	16.7	49.4	0	0.0	48.3	0	0.0	41.1	56.5
Upper	2	40.0	29.2	150	71.4	38.2	0	0.0	34.5	0	0.0	46.0	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	210	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	17.8	0	0.0	11.8	0	0.0	21.7	0	0.0	13.7	12.0
Middle	0	0.0	51.1	0	0.0	35.3	0	0.0	41.3	0	0.0	36.4	56.5
Upper	0	0.0	31.1	0	0.0	52.9	1	100.0	37.0	478	100.0	49.9	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	478	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Great Falls, MT MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	2.3	5.5	122	1.4	2.9	5	9.4	6.9	538	4.4	4.0	19.8
Moderate	8	18.6	19.0	1,003	11.6	14.4	12	22.6	22.8	1,922	15.6	18.0	18.5
Middle	15	34.9	24.0	3,011	34.7	21.7	9	17.0	25.0	1,881	15.3	23.8	22.1
Upper	17	39.5	33.1	4,081	47.1	41.7	23	43.4	28.4	6,651	54.1	36.6	39.6
Unknown	2	4.7	18.3	455	5.2	19.3	4	7.5	17.0	1,292	10.5	17.6	0.0
Total	43	100.0	100.0	8,672	100.0	100.0	53	100.0	100.0	12,284	100.0	100.0	100.0
Refinance Loans													
Low	5	13.5	5.1	302	5.9	2.4	2	2.1	3.9	238	1.3	2.1	19.8
Moderate	4	10.8	13.1	376	7.3	8.6	16	16.5	11.4	1,704	9.2	7.6	18.5
Middle	11	29.7	20.4	1,547	30.1	16.8	15	15.5	15.4	2,668	14.4	13.3	22.1
Upper	14	37.8	34.3	2,632	51.2	39.3	56	57.7	33.1	12,567	68.0	37.9	39.6
Unknown	3	8.1	27.1	282	5.5	33.0	8	8.2	36.2	1,292	7.0	39.1	0.0
Total	37	100.0	100.0	5,139	100.0	100.0	97	100.0	100.0	18,469	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Great Falls, MT MSA

Home Improvement Loans													
Low	0	0.0	4.7	0	0.0	2.8	2	18.2	5.2	40	7.8	3.1	19.8
Moderate	2	16.7	15.6	75	11.2	8.6	0	0.0	19.5	0	0.0	18.7	18.5
Middle	3	25.0	21.9	320	47.9	27.1	2	18.2	19.5	40	7.8	13.1	22.1
Upper	6	50.0	51.6	224	33.5	55.0	7	63.6	51.9	436	84.5	61.8	39.6
Unknown	1	8.3	6.3	49	7.3	6.5	0	0.0	3.9	0	0.0	3.3	0.0
Total	12	100.0	100.0	668	100.0	100.0	11	100.0	100.0	516	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	6.3	5.4	444	2.9	2.7	9	5.3	5.1	816	2.5	2.9	19.8
Moderate	19	17.0	16.7	1,614	10.5	12.2	30	17.6	16.2	3,780	11.6	12.2	18.5
Middle	32	28.6	22.3	4,986	32.4	19.7	27	15.9	19.3	4,667	14.4	17.8	22.1
Upper	48	42.9	34.0	7,577	49.2	40.8	90	52.9	31.1	20,080	61.9	37.1	39.6
Unknown	6	5.4	21.7	786	5.1	24.5	14	8.2	28.3	3,112	9.6	29.9	0.0
Total	112	100.0	100.0	15,407	100.0	100.0	170	100.0	100.0	32,455	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Great Falls, MT MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	6.7	7.0	20	2.8	4.7	0	0.0	0.0	0	0.0	0.0	19.8
Moderate	4	26.7	23.3	135	18.8	17.1	2	25.0	13.5	154	21.8	8.1	18.5
Middle	3	20.0	16.3	108	15.0	12.9	1	12.5	21.6	78	11.0	15.1	22.1
Upper	7	46.7	51.2	455	63.4	62.9	4	50.0	56.8	426	60.2	72.3	39.6
Unknown	0	0.0	2.3	0	0.0	2.4	1	12.5	8.1	50	7.1	4.5	0.0
Total	15	100.0	100.0	718	100.0	100.0	8	100.0	100.0	708	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.7	0	0.0	5.0	0	0.0	6.9	0	0.0	3.0	19.8
Moderate	1	20.0	20.0	25	11.9	18.8	0	0.0	17.2	0	0.0	12.9	18.5
Middle	0	0.0	23.1	0	0.0	23.1	0	0.0	10.3	0	0.0	8.8	22.1
Upper	4	80.0	44.6	185	88.1	45.5	0	0.0	55.2	0	0.0	62.7	39.6
Unknown	0	0.0	4.6	0	0.0	7.6	0	0.0	10.3	0	0.0	12.6	0.0
Total	5	100.0	100.0	210	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1	0.2	0.0	18.5

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Great Falls, MT MSA

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.1
Upper	0	0.0	8.9	0	0.0	27.6	0	0.0	2.2	0	0.0	2.6	39.6
Unknown	0	0.0	91.1	0	0.0	72.4	1	100.0	97.8	0	0.0	97.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	478	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Great Falls, MT MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	24	16.6	23.6	1,912	14.0	23.6	123	31.2	24.8	10,315	24.9	25.5	27.0
Middle	91	62.8	51.7	8,469	61.9	57.1	174	44.2	49.2	19,719	47.7	48.1	50.0
Upper	30	20.7	22.7	3,295	24.1	17.8	97	24.6	25.0	11,349	27.4	25.7	23.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.0	0	0.0	1.4	0	0.0	1.0	0	0.0	0.7	
Total	145	100.0	100.0	13,676	100.0	100.0	394	100.0	100.0	41,383	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Great Falls, MT MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	71	49.0	49.5	5,471	40.0	40.4	120	30.5	47.6	8,261	20.0	34.2	90.7
Over $1 Million	56	38.6		7,415	54.2		71	18.0		15,161	36.6		8.2
Revenue Unknown	18	12.4		790	5.8		203	51.5		17,961	43.4		1.1
Total	145	100.0		13,676	100.0		394	100.0		41,383	100.0		100.0
By Loan Size													
$100,000 or Less	114	78.6	93.6	4,213	30.8	44.9	284	72.1	86.0	9,847	23.8	35.3	
$100,001 - $250,000	18	12.4	3.4	3,056	22.3	15.7	65	16.5	8.7	10,315	24.9	23.4	

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Great Falls, MT MSA													
$250,001 - $1 Million	13	9.0	3.0	6,407	46.8	39.4	45	11.4	5.3	21,221	51.3	41.3	
Total	145	100.0	100.0	13,676	100.0	100.0	394	100.0	100.0	41,383	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	61	85.9		1,666	30.5		97	80.8		2,958	35.8		
$100,001 - $250,000	5	7.0		757	13.8		18	15.0		2,834	34.3		
$250,001 - $1 Million	5	7.0		3,048	55.7		5	4.2		2,469	29.9		
Total	71	100.0		5,471	100.0		120	100.0		8,261	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Great Falls, MT MSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.4	0	0.0	0.5	0	0.0	0.6	0	0.0	0.0	4.2
Middle	13	65.0	87.8	1,986	78.1	87.8	3	50.0	88.1	73	38.4	89.7	81.7
Upper	7	35.0	8.9	556	21.9	11.3	3	50.0	10.0	117	61.6	9.5	14.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	0.3	0	0.0	1.3	0	0.0	0.7	
Total	20	100.0	100.0	2,542	100.0	100.0	6	100.0	100.0	190	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Great Falls, MT MSA													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	17	85.0	81.2	2,067	81.3	86.6	5	83.3	83.8	143	75.3	92.9	98.1
Over $1 Million	2	10.0		425	16.7		0	0.0		0	0.0		1.5
Revenue	1	5.0		50	2.0		1	16.7		47	24.7		0.4

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Great Falls, MT MSA													
Unknown													
Total	20	100.0		2,542	100.0		6	100.0		190	100.0		100.0
By Loan Size													
$100,000 or Less	12	60.0	77.0	457	18.0	32.5	6	100.0	77.5	190	100.0	36.1	
$100,001 - $250,000	5	25.0	15.0	714	28.1	34.1	0	0.0	15.0	0	0.0	32.5	
$250,001 - $500,000	3	15.0	8.0	1,371	53.9	33.5	0	0.0	7.5	0	0.0	31.3	
Total	20	100.0	100.0	2,542	100.0	100.0	6	100.0	100.0	190	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	10	58.8		382	18.5		5	100.0		143	100.0		
$100,001 - $250,000	5	29.4		714	34.5		0	0.0		0	0.0		
$250,001 - $500,000	2	11.8		971	47.0		0	0.0		0	0.0		
Total	17	100.0		2,067	100.0		5	100.0		143	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Great Falls, MT MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	23	17.3%	0	0.0%	0	0.0%
Low/Moderate Total	1	50.0%	23	17.3%	0	0.0%	0	0.0%
Middle	1	50.0%	110	82.7%	1	50.0%	110	82.7%
Upper	0	0.0%	0	0.0%	1	50.0%	23	17.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	133	100.0%	2	100.0%	133	100.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	4	4.4%	77	3.2%
Moderate	15	16.7%	342	14.3%	17	18.9%	389	16.2%
Low/Moderate Total	15	16.7%	342	14.3%	21	23.3%	466	19.4%
Middle	52	57.8%	1,274	53.1%	25	27.8%	573	23.9%
Upper	23	25.6%	784	32.7%	43	47.8%	1,349	56.2%
Unknown	0	0.0%	0	0.0%	1	1.1%	12	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Total	90	100.0%	2,400	100.0%	90	100.0%	2,400	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	3	7.1%	12	1.0%
Moderate	8	19.0%	139	12.0%	7	16.7%	166	14.3%
Low/Moderate Total	8	19.0%	139	12.0%	10	23.8%	178	15.3%
Middle	22	52.4%	667	57.4%	9	21.4%	239	20.6%
Upper	12	28.6%	356	30.6%	23	54.8%	745	64.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	42	100.0%	1,162	100.0%	42	100.0%	1,162	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	21	13.1%	71	5.5%
Moderate	22	13.8%	246	19.0%	34	21.3%	102	7.9%
Low/Moderate Total	22	13.8%	246	19.0%	55	34.4%	173	13.3%
Middle	93	58.1%	642	49.5%	48	30.0%	348	26.9%
Upper	45	28.1%	408	31.5%	53	33.1%	716	55.2%
Unknown	0	0.0%	0	0.0%	4	2.5%	59	4.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	160	100.0%	1,296	100.0%	160	100.0%	1,296	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	28	9.5%	160	3.2%
Moderate	46	15.6%	750	15.0%	58	19.7%	657	13.2%
Low/Moderate Total	46	15.6%	750	15.0%	86	29.3%	817	16.4%
Middle	168	57.1%	2,693	54.0%	83	28.2%	1,270	25.4%
Upper	80	27.2%	1,548	31.0%	120	40.8%	2,833	56.8%
Unknown	0	0.0%	0	0.0%	5	1.7%	71	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	294	100.0%	4,991	100.0%	294	100.0%	4,991	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Great Falls, MT MSA

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	12	11.9%	178	7.1%

Moderate	14	13.9%	291	11.6%	17	16.8%	313	12.5%
Low/Moderate Total	14	13.9%	291	11.6%	29	28.7%	491	19.7%
Middle	65	64.4%	1,642	65.7%	20	19.8%	550	22.0%
Upper	22	21.8%	565	22.6%	52	51.5%	1,457	58.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	101	100.0%	2,498	100.0%	101	100.0%	2,498	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	2.6%	31	1.2%
Moderate	8	10.5%	226	8.7%	5	6.6%	94	3.6%
Low/Moderate Total	8	10.5%	226	8.7%	7	9.2%	125	4.8%
Middle	40	52.6%	1,315	50.8%	18	23.7%	436	16.8%
Upper	28	36.8%	1,048	40.5%	51	67.1%	2,028	78.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	76	100.0%	2,589	100.0%	76	100.0%	2,589	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	18	15.1%	56	6.0%
Moderate	11	9.2%	43	4.6%	20	16.8%	109	11.7%
Low/Moderate Total	11	9.2%	43	4.6%	38	31.9%	165	17.6%
Middle	67	56.3%	293	31.3%	22	18.5%	142	15.2%
Upper	41	34.5%	599	64.1%	59	49.6%	628	67.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	119	100.0%	935	100.0%	119	100.0%	935	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	32	10.8%	265	4.4%
Moderate	33	11.1%	560	9.3%	42	14.2%	516	8.6%
Low/Moderate Total	33	11.1%	560	9.3%	74	25.0%	781	13.0%
Middle	172	58.1%	3,250	54.0%	60	20.3%	1,128	18.7%
Upper	91	30.7%	2,212	36.7%	162	54.7%	4,113	68.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	296	100.0%	6,022	100.0%	296	100.0%	6,022	100.0%

2020 Great Falls, MT MSA 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	4,193	19.8
Moderate	5	22.7	3,438	16.2	989	28.8	3,908	18.5
Middle	13	59.1	12,004	56.7	1,023	8.5	4,676	22.1
Upper	4	18.2	5,726	27.1	323	5.6	8,391	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22**	**100.0**	**21,168**	**100.0**	**2,335**	**11.0**	**21,168**	**100.0**

2020 Great Falls, MT MSA AA Demographics								
	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	7,328	2,571	12.0	35.1	4,127	56.3	630	8.6
Middle	21,354	12,135	56.5	56.8	6,602	30.9	2,617	12.3
Upper	8,871	6,763	31.5	76.2	1,586	17.9	522	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**37,553**	**21,469**	**100.0**	**57.2**	**12,315**	**32.8**	**3,769**	**10.0**

	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	1,106	27.0	987	26.6	111	33.0	8	18.2
Middle	2,049	50.0	1,860	50.1	160	47.6	29	65.9
Upper	941	23.0	869	23.4	65	19.3	7	15.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,096**	**100.0**	**3,716**	**100.0**	**336**	**100.0**	**44**	**100.0**
Percentage of Total Businesses:				**90.7**		**8.2**		**1.1**

	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	11	4.2	10	3.9	1	25.0	0	0.0
Middle	215	81.7	212	82.2	3	75.0	0	0.0
Upper	37	14.1	36	14.0	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**263**	**100.0**	**258**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.1**		**1.5**		**0.4**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Hamilton, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	30.0	38.0	1,852	21.4	34.6	6	28.6	41.1	1,418	22.8	35.2	40.0
Middle	18	60.0	50.6	5,861	67.7	53.4	14	66.7	48.0	4,461	71.8	52.6	49.9
Upper	3	10.0	11.4	945	10.9	12.0	1	4.8	10.9	337	5.4	12.2	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	8,658	100.0	100.0	21	100.0	100.0	6,216	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	16.0	33.1	660	12.7	32.0	17	32.1	33.8	3,659	28.1	31.5	40.0
Middle	19	76.0	55.8	4,138	79.5	55.6	26	49.1	52.7	6,685	51.3	54.2	49.9
Upper	2	8.0	11.0	410	7.9	12.4	10	18.9	13.5	2,680	20.6	14.3	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	5,208	100.0	100.0	53	100.0	100.0	13,024	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	14.3	35.1	42	4.0	40.7	6	37.5	37.5	434	27.6	37.5	40.0
Middle	11	78.6	50.9	989	95.0	49.0	8	50.0	51.8	791	50.3	48.1	49.9
Upper	1	7.1	14.0	10	1.0	10.3	2	12.5	10.7	349	22.2	14.4	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,041	100.0	100.0	16	100.0	100.0	1,574	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	100.0	100.0	1,919	100.0	100.0	1	50.0	28.6	444	91.5	6.9	72.4
Middle	0	0.0	0.0	0	0.0	0.0	1	50.0	71.4	41	8.5	93.1	27.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,919	100.0	100.0	2	100.0	100.0	485	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	20	25.0	36.3	4,645	26.1	34.2	30	30.9	36.6	5,955	27.4	32.3	40.0
Middle	54	67.5	52.6	11,757	66.2	53.9	54	55.7	51.2	12,384	57.1	54.8	49.9
Upper	6	7.5	11.1	1,365	7.7	11.9	13	13.4	12.3	3,366	15.5	12.9	10.1

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Hamilton, MT													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	80	100.0	100.0	17,767	100.0	100.0	97	100.0	100.0	21,705	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Hamilton, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	33.3	44.2	172	18.3	43.3	0	0.0	34.3	0	0.0	22.6	40.0
Middle	6	66.7	48.1	769	81.7	52.5	4	100.0	62.9	334	100.0	76.4	49.9
Upper	0	0.0	7.7	0	0.0	4.2	0	0.0	2.9	0	0.0	1.0	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	941	100.0	100.0	4	100.0	100.0	334	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	42.9	0	0.0	60.7	0	0.0	37.5	0	0.0	31.3	40.0
Middle	0	0.0	47.6	0	0.0	29.6	1	100.0	58.3	72	100.0	67.2	49.9
Upper	0	0.0	9.5	0	0.0	9.7	0	0.0	4.2	0	0.0	1.5	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	72	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	35.3	0	0.0	36.3	0	0.0	44.4	0	0.0	35.5	40.0
Middle	0	0.0	58.8	0	0.0	58.9	0	0.0	44.4	0	0.0	48.4	49.9
Upper	0	0.0	5.9	0	0.0	4.8	0	0.0	11.1	0	0.0	16.1	10.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Hamilton, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	6.7	4.3	145	1.7	1.9	0	0.0	3.9	0	0.0	1.8	24.9
Moderate	5	16.7	15.7	953	11.0	11.8	3	14.3	16.0	520	8.4	11.2	18.3
Middle	8	26.7	24.5	1,978	22.8	22.3	5	23.8	22.0	1,477	23.8	19.2	21.6
Upper	14	46.7	43.1	5,194	60.0	51.8	11	52.4	49.1	3,729	60.0	58.0	35.1
Unknown	1	3.3	12.5	388	4.5	12.2	2	9.5	9.1	490	7.9	9.9	0.0
Total	30	100.0	100.0	8,658	100.0	100.0	21	100.0	100.0	6,216	100.0	100.0	100.0
Refinance Loans													
Low	1	4.0	3.2	20	0.4	1.3	7	13.2	4.0	845	6.5	2.0	24.9
Moderate	4	16.0	18.4	382	7.3	13.4	2	3.8	14.9	378	2.9	10.6	18.3
Middle	2	8.0	20.9	555	10.7	18.2	9	17.0	19.8	1,977	15.2	17.3	21.6
Upper	16	64.0	39.9	3,698	71.0	47.0	33	62.3	38.9	9,399	72.2	46.9	35.1
Unknown	2	8.0	17.5	553	10.6	20.1	2	3.8	22.4	425	3.3	23.2	0.0
Total	25	100.0	100.0	5,208	100.0	100.0	53	100.0	100.0	13,024	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	2.7	0	0.0	1.8	0	0.0	0.6	24.9
Moderate	1	7.1	8.8	150	14.4	9.0	3	18.8	16.1	160	10.2	7.5	18.3
Middle	5	35.7	28.1	573	55.0	32.7	2	12.5	19.6	284	18.0	16.7	21.6
Upper	8	57.1	59.6	318	30.5	54.9	11	68.8	57.1	1,130	71.8	60.8	35.1
Unknown	0	0.0	1.8	0	0.0	0.6	0	0.0	5.4	0	0.0	14.5	0.0
Total	14	100.0	100.0	1,041	100.0	100.0	16	100.0	100.0	1,574	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	3.8	3.9	165	1.0	1.7	7	7.4	4.0	845	4.0	1.9	24.9
Moderate	11	14.1	16.2	1,534	9.7	12.3	8	8.4	15.2	1,058	5.0	10.7	18.3
Middle	16	20.5	22.8	3,126	19.7	20.5	16	16.8	20.4	3,738	17.6	18.0	21.6
Upper	45	57.7	42.4	10,082	63.6	49.6	59	62.1	42.9	14,615	68.9	51.5	35.1
Unknown	3	3.8	14.7	941	5.9	15.9	5	5.3	17.5	964	4.5	17.9	0.0
Total	78	100.0	100.0	15,848	100.0	100.0	95	100.0	100.0	21,220	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Hamilton, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.9	0	0.0	2.2	0	0.0	8.6	0	0.0	3.3	24.9
Moderate	1	11.1	17.3	49	5.2	13.8	0	0.0	14.3	0	0.0	5.1	18.3
Middle	1	11.1	21.2	20	2.1	12.0	0	0.0	8.6	0	0.0	10.4	21.6
Upper	7	77.8	55.8	872	92.7	70.0	3	75.0	54.3	285	85.3	63.8	35.1
Unknown	0	0.0	3.8	0	0.0	2.0	1	25.0	14.3	49	14.7	17.4	0.0
Total	9	100.0	100.0	941	100.0	100.0	4	100.0	100.0	334	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	19.0	0	0.0	10.4	0	0.0	12.5	0	0.0	4.2	24.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	7.6	18.3
Middle	0	0.0	19.0	0	0.0	29.2	0	0.0	29.2	0	0.0	22.6	21.6
Upper	0	0.0	52.4	0	0.0	49.7	1	100.0	41.7	72	100.0	65.6	35.1
Unknown	0	0.0	9.5	0	0.0	10.7	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	72	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	35.1
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Hamilton, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	20	41.7	39.8	2,561	52.9	41.2	77	55.8	43.8	7,393	68.9	44.2	48.4
Middle	20	41.7	48.3	1,980	40.9	43.7	50	36.2	44.4	2,605	24.3	43.4	42.6
Upper	8	16.7	7.9	302	6.2	10.5	11	8.0	9.1	728	6.8	9.2	9.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Hamilton, MT													
Tract-Unk	0	0.0	4.0	0	0.0	4.6	0	0.0	2.7	0	0.0	3.2	
Total	48	100.0	100.0	4,843	100.0	100.0	138	100.0	100.0	10,726	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Hamilton, MT													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	32	66.7	50.9	2,814	58.1	47.8	36	26.1	47.0	4,352	40.6	38.6	94.0
Over $1 Million	13	27.1		1,877	38.8		12	8.7		2,862	26.7		5.2
Revenue Unknown	3	6.3		152	3.1		90	65.2		3,512	32.7		0.8
Total	48	100.0		4,843	100.0		138	100.0		10,726	100.0		100.0
By Loan Size													
$100,000 or Less	37	77.1	95.7	1,528	31.6	52.1	116	84.1	91.1	3,382	31.5	35.8	
$100,001 - $250,000	7	14.6	2.8	1,314	27.1	17.9	10	7.2	5.3	1,737	16.2	20.4	
$250,001 - $1 Million	4	8.3	1.6	2,001	41.3	30.1	12	8.7	3.6	5,607	52.3	43.8	
Total	48	100.0	100.0	4,843	100.0	100.0	138	100.0	100.0	10,726	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	25	78.1		877	31.2		27	75.0		823	18.9		
$100,001 - $250,000	4	12.5		893	31.7		2	5.6		363	8.3		
$250,001 - $1 Million	3	9.4		1,044	37.1		7	19.4		3,166	72.7		
Total	32	100.0		2,814	100.0		36	100.0		4,352	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Hamilton, MT													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	12.2	0	0.0	20.5	0	0.0	4.1	36.7
Middle	0	0.0	57.8	0	0.0	66.4	1	100.0	63.6	46	100.0	81.6	57.1
Upper	0	0.0	15.6	0	0.0	18.3	0	0.0	13.6	0	0.0	11.5	6.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	3.1	0	0.0	2.3	0	0.0	2.8	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	46	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Hamilton, MT													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	48.4	0	0.0	57.2	1	100.0	50.0	46	100.0	63.1	99.1
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		1	100.0		46	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	100.0	0	0.0	100.0	1	100.0	90.9	46	100.0	55.3	
$100,001 - $250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	9.1	0	0.0	44.7	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	46	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	100.0		46	100.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Hamilton, MT													
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		46	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Hamilton, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	1.7%	6	0.4%
Moderate	22	37.3%	594	35.7%	16	27.1%	387	23.2%
Low/Moderate Total	22	37.3%	594	35.7%	17	28.8%	393	23.6%
Middle	29	49.2%	863	51.8%	18	30.5%	482	28.9%
Upper	8	13.6%	209	12.5%	24	40.7%	791	47.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	59	100.0%	1,666	100.0%	59	100.0%	1,666	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	3.3%	7	0.5%
Moderate	26	42.6%	600	39.5%	12	19.7%	220	14.5%
Low/Moderate Total	26	42.6%	600	39.5%	14	23.0%	227	14.9%
Middle	27	44.3%	766	50.4%	15	24.6%	324	21.3%
Upper	8	13.1%	154	10.1%	32	52.5%	969	63.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	61	100.0%	1,520	100.0%	61	100.0%	1,520	100.0%
	Other - Unsecured							

Low	0	0.0%	0	0.0%	3	14.3%	32	15.5%
Moderate	8	38.1%	53	25.6%	4	19.0%	29	14.0%
Low/Moderate Total	8	38.1%	53	25.6%	7	33.3%	61	29.5%
Middle	8	38.1%	95	45.9%	6	28.6%	81	39.1%
Upper	5	23.8%	59	28.5%	8	38.1%	65	31.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	207	100.0%	21	100.0%	207	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	4.3%	45	1.3%
Moderate	56	39.7%	1,247	36.8%	32	22.7%	636	18.7%
Low/Moderate Total	56	39.7%	1,247	36.8%	38	27.0%	681	20.1%
Middle	64	45.4%	1,724	50.8%	39	27.7%	887	26.1%
Upper	21	14.9%	422	12.4%	64	45.4%	1,825	53.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	141	100.0%	3,393	100.0%	141	100.0%	3,393	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Hamilton, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	4	7.8%	52	4.0%
Moderate	23	45.1%	595	46.0%	12	23.5%	264	20.4%
Low/Moderate Total	23	45.1%	595	46.0%	16	31.4%	316	24.4%
Middle	24	47.1%	631	48.8%	7	13.7%	162	12.5%
Upper	4	7.8%	67	5.2%	27	52.9%	807	62.4%
Unknown	0	0.0%	0	0.0%	1	2.0%	8	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	51	100.0%	1,293	100.0%	51	100.0%	1,293	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	3.9%	27	2.1%
Moderate	17	33.3%	512	40.3%	11	21.6%	303	23.9%
Low/Moderate Total	17	33.3%	512	40.3%	13	25.5%	330	26.0%
Middle	34	66.7%	757	59.7%	14	27.5%	321	25.3%
Upper	0	0.0%	0	0.0%	24	47.1%	618	48.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	51	100.0%	1,269	100.0%	51	100.0%	1,269	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	37.5%	81	30.6%	5	31.3%	60	22.6%
Low/Moderate Total	6	37.5%	81	30.6%	5	31.3%	60	22.6%
Middle	7	43.8%	167	63.0%	4	25.0%	129	48.7%
Upper	3	18.8%	17	6.4%	7	43.8%	76	28.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	265	100.0%	16	100.0%	265	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	5.1%	79	2.8%
Moderate	46	39.0%	1,188	42.0%	28	23.7%	627	22.2%
Low/Moderate Total	46	39.0%	1,188	42.0%	34	28.8%	706	25.0%

Middle	65	55.1%	1,555	55.0%	25	21.2%	612	21.6%
Upper	7	5.9%	84	3.0%	58	49.2%	1,501	53.1%
Unknown	0	0.0%	0	0.0%	1	0.8%	8	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	118	100.0%	2,827	100.0%	118	100.0%	2,827	100.0%

2020 Hamilton, MT 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	2,627	24.9
Moderate	4	40.0	4,352	41.3	637	14.6	1,933	18.3
Middle	5	50.0	5,131	48.7	578	11.3	2,272	21.6
Upper	1	10.0	1,052	10.0	73	6.9	3,703	35.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**10,535**	**100.0**	**1,288**	**12.2**	**10,535**	**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	8,798	4,631	40.0	52.6	2,809	31.9	1,358	15.4
Middle	9,174	5,773	49.9	62.9	1,991	21.7	1,410	15.4
Upper	1,594	1,172	10.1	73.5	273	17.1	149	9.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**19,566**	**11,576**	**100.0**	**59.2**	**5,073**	**25.9**	**2,917**	**14.9**

	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	1,282	48.4	1,191	47.8	82	59.9	9	42.9
Middle	1,127	42.6	1,068	42.9	48	35.0	11	52.4
Upper	239	9.0	231	9.3	7	5.1	1	4.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,648**	**100.0**	**2,490**	**100.0**	**137**	**100.0**	**21**	**100.0**
Percentage of Total Businesses:				**94.0**		**5.2**		**0.8**

2020 Hamilton, MT AA Demographics								
	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	83	36.7	83	37.1	0	0.0	0	0.0
Middle	129	57.1	127	56.7	2	100.0	0	0.0
Upper	14	6.2	14	6.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**226**	**100.0**	**224**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Hardin-Miles City, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	1.5	16.1
Middle	37	80.4	80.5	4,838	73.0	77.9	31	77.5	84.2	5,052	78.6	83.7	67.0
Upper	9	19.6	19.5	1,788	27.0	22.1	9	22.5	14.8	1,377	21.4	14.8	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	6,626	100.0	100.0	40	100.0	100.0	6,429	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	8.7	3.2	102	4.0	2.0	3	8.8	1.7	633	12.9	2.7	16.1
Middle	17	73.9	83.1	2,073	80.4	83.4	23	67.6	80.3	2,825	57.6	77.6	67.0
Upper	4	17.4	13.7	402	15.6	14.6	8	23.5	17.9	1,446	29.5	19.7	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	2,577	100.0	100.0	34	100.0	100.0	4,904	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	11.1	4.8	79	14.3	7.3	0	0.0	0.0	0	0.0	0.0	16.1

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Hardin-Miles City, MT													
Middle	5	55.6	71.4	268	48.4	66.9	4	80.0	81.3	236	95.9	63.4	67.0
Upper	3	33.3	23.8	207	37.4	25.8	1	20.0	18.8	10	4.1	36.6	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	554	100.0	100.0	5	100.0	100.0	246	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	20.0	0	0.0	4.7	8.6
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	80.0	0	0.0	95.3	83.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	7.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	3.4	1.4	181	1.8	0.8	3	3.3	1.8	633	5.2	2.5	16.1
Middle	68	77.3	81.1	7,401	73.9	79.1	67	74.4	81.8	8,526	70.1	81.8	67.0
Upper	17	19.3	17.5	2,427	24.2	20.0	20	22.2	16.3	3,008	24.7	15.7	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	88	100.0	100.0	10,009	100.0	100.0	90	100.0	100.0	12,167	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Hardin-Miles City, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.1
Middle	8	88.9	92.9	166	84.7	90.5	9	81.8	78.9	413	70.2	71.7	67.0
Upper	1	11.1	7.1	30	15.3	9.5	2	18.2	21.1	175	29.8	28.3	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	196	100.0	100.0	11	100.0	100.0	588	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Hardin-Miles City, MT

Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.1
Middle	1	100.0	100.0	56	100.0	100.0	0	0.0	100.0	0	0.0	100.0	67.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	56	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.0	0	0.0	7.1	0	0.0	14.3	0	0.0	16.0	16.1
Middle	0	0.0	60.0	0	0.0	47.1	0	0.0	66.7	0	0.0	60.2	67.0
Upper	0	0.0	30.0	0	0.0	45.9	0	0.0	19.0	0	0.0	23.7	17.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Hardin-Miles City, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	4.3	6.2	192	2.9	3.8	2	5.0	5.4	181	2.8	3.1	23.9
Moderate	7	15.2	16.0	671	10.1	10.8	14	35.0	25.3	1,766	27.5	20.0	16.8
Middle	13	28.3	28.0	1,883	28.4	27.8	8	20.0	23.2	1,424	22.1	23.4	19.5
Upper	19	41.3	29.2	3,375	50.9	36.5	13	32.5	26.9	2,516	39.1	33.7	39.7
Unknown	5	10.9	20.6	505	7.6	21.1	3	7.5	19.2	542	8.4	19.8	0.0
Total	46	100.0	100.0	6,626	100.0	100.0	40	100.0	100.0	6,429	100.0	100.0	100.0
Refinance Loans													
Low	1	4.3	7.3	25	1.0	3.5	2	5.9	3.4	225	4.6	1.5	23.9
Moderate	2	8.7	12.1	118	4.6	7.8	5	14.7	12.8	702	14.3	10.0	16.8
Middle	3	13.0	16.9	183	7.1	15.8	6	17.6	20.1	1,115	22.7	19.2	19.5
Upper	16	69.6	37.9	2,176	84.4	42.6	20	58.8	35.0	2,674	54.5	39.2	39.7
Unknown	1	4.3	25.8	75	2.9	30.2	1	2.9	28.6	188	3.8	30.1	0.0
Total	23	100.0	100.0	2,577	100.0	100.0	34	100.0	100.0	4,904	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Hardin-Miles City, MT

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	20.0	12.5	50	20.3	7.3	23.9
Moderate	1	11.1	14.3	79	14.3	10.8	2	40.0	18.8	42	17.1	10.8	16.8
Middle	3	33.3	28.6	159	28.7	28.1	0	0.0	18.8	0	0.0	21.7	19.5
Upper	4	44.4	47.6	299	54.0	57.7	1	20.0	43.8	50	20.3	52.5	39.7
Unknown	1	11.1	9.5	17	3.1	3.4	1	20.0	6.3	104	42.3	7.6	0.0
Total	9	100.0	100.0	554	100.0	100.0	5	100.0	100.0	246	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	5.7	6.9	267	2.7	3.8	5	5.6	4.6	456	3.7	2.4	23.9
Moderate	10	11.4	14.5	868	8.7	10.1	25	27.8	19.5	2,751	22.6	15.4	16.8
Middle	21	23.9	24.0	2,262	22.6	23.6	17	18.9	21.2	2,654	21.8	21.1	19.5
Upper	45	51.1	32.1	6,015	60.1	38.0	38	42.2	29.8	5,472	45.0	35.7	39.7
Unknown	7	8.0	22.4	597	6.0	24.5	5	5.6	24.9	834	6.9	25.4	0.0
Total	88	100.0	100.0	10,009	100.0	100.0	90	100.0	100.0	12,167	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Hardin-Miles City, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	22.2	14.3	50	25.5	15.9	0	0.0	0.0	0	0.0	0.0	23.9
Moderate	0	0.0	7.1	0	0.0	2.9	4	36.4	31.6	241	41.0	29.5	16.8
Middle	2	22.2	35.7	37	18.9	38.7	3	27.3	26.3	115	19.6	20.6	19.5
Upper	5	55.6	42.9	109	55.6	42.5	4	36.4	36.8	232	39.5	45.6	39.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	5.3	0	0.0	4.3	0.0
Total	9	100.0	100.0	196	100.0	100.0	11	100.0	100.0	588	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	42.9	0	0.0	30.1	0	0.0	33.3	0	0.0	20.3	23.9
Moderate	0	0.0	28.6	0	0.0	46.4	0	0.0	33.3	0	0.0	37.3	16.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	33.3	0	0.0	42.5	19.5
Upper	1	100.0	14.3	56	100.0	12.3	0	0.0	0.0	0	0.0	0.0	39.7
Unknown	0	0.0	14.3	0	0.0	11.2	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	56	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.9
Moderate	0	0.0	10.0	0	0.0	9.5	0	0.0	0.0	0	0.0	0.0	16.8

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Hardin-Miles City, MT

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	39.7
Unknown	0	0.0	90.0	0	0.0	90.5	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Hardin-Miles City, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	8.9	5.7	1,272	20.3	6.2	33	11.8	6.4	1,545	11.0	3.0	9.5
Middle	71	70.3	70.6	4,147	66.3	64.2	197	70.6	73.8	10,375	73.6	77.6	75.7
Upper	21	20.8	15.7	834	13.3	26.9	49	17.6	18.0	2,171	15.4	18.8	14.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	8.0	0	0.0	2.7	0	0.0	1.7	0	0.0	0.7	
Total	101	100.0	100.0	6,252	100.0	100.0	279	100.0	100.0	14,091	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Hardin-Miles City, MT

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	77	76.2	54.3	4,222	67.5	44.5	127	45.5	50.6	5,111	36.3	40.2	89.5
Over $1 Million	17	16.8		1,841	29.4		34	12.2		2,849	20.2		8.8
Revenue Unknown	7	6.9		189	3.0		118	42.3		6,131	43.5		1.7

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Hardin-Miles City, MT													
Total	101	100.0		6,252	100.0		279	100.0		14,091	100.0		100.0
By Loan Size													
$100,000 or Less	87	86.1	90.4	2,703	43.2	34.6	245	87.8	88.6	6,669	47.3	41.5	
$100,001 - $250,000	10	9.9	5.3	1,750	28.0	19.0	25	9.0	7.9	3,560	25.3	23.7	
$250,001 - $1 Million	4	4.0	4.3	1,799	28.8	46.4	9	3.2	3.5	3,862	27.4	34.9	
Total	101	100.0	100.0	6,252	100.0	100.0	279	100.0	100.0	14,091	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	67	87.0		1,999	47.3		116	91.3		2,955	57.8		
$100,001 - $250,000	8	10.4		1,450	34.3		8	6.3		1,035	20.3		
$250,001 - $1 Million	2	2.6		773	18.3		3	2.4		1,121	21.9		
Total	77	100.0		4,222	100.0		127	100.0		5,111	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Hardin-Miles City, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	28	23.7	19.6	1,975	23.3	19.4	20	23.0	21.0	758	11.2	15.0	15.3
Middle	59	50.0	40.9	4,251	50.1	39.9	38	43.7	41.4	2,798	41.5	39.2	60.0
Upper	31	26.3	36.9	2,257	26.6	40.1	29	33.3	36.2	3,182	47.2	45.3	24.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.6	0	0.0	0.6	0	0.0	1.3	0	0.0	0.5	
Total	118	100.0	100.0	8,483	100.0	100.0	87	100.0	100.0	6,738	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Hardin-Miles City, MT

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Hardin-Miles City, MT													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	106	89.8	83.5	7,754	91.4	89.2	80	92.0	80.6	6,064	90.0	90.4	99.1
Over $1 Million	5	4.2		574	6.8		2	2.3		544	8.1		0.5
Revenue Unknown	7	5.9		155	1.8		5	5.7		130	1.9		0.5
Total	118	100.0		8,483	100.0		87	100.0		6,738	100.0		100.0
By Loan Size													
$100,000 or Less	92	78.0	70.7	3,011	35.5	26.3	69	79.3	71.2	2,388	35.4	26.2	
$100,001 - $250,000	19	16.1	20.7	2,949	34.8	38.4	11	12.6	16.5	1,844	27.4	28.4	
$250,001 - $500,000	7	5.9	8.5	2,523	29.7	35.3	7	8.0	12.3	2,506	37.2	45.4	
Total	118	100.0	100.0	8,483	100.0	100.0	87	100.0	100.0	6,738	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	82	77.4		2,749	35.5		63	78.8		2,163	35.7		
$100,001 - $250,000	18	17.0		2,812	36.3		11	13.8		1,844	30.4		
$250,001 - $500,000	6	5.7		2,193	28.3		6	7.5		2,057	33.9		
Total	106	100.0		7,754	100.0		80	100.0		6,064	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Hardin-Miles City, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	25	9.2%	444	6.8%
Moderate	56	20.5%	1,648	25.3%	47	17.2%	988	15.2%
Low/Moderate Total	56	20.5%	1,648	25.3%	72	26.4%	1,432	22.0%
Middle	163	59.7%	3,727	57.2%	67	24.5%	1,536	23.6%
Upper	54	19.8%	1,144	17.5%	128	46.9%	3,382	51.9%
Unknown	0	0.0%	0	0.0%	6	2.2%	169	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	273	100.0%	6,519	100.0%	273	100.0%	6,519	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	15	11.5%	237	13.2%
Moderate	25	19.1%	239	13.3%	22	16.8%	186	10.4%
Low/Moderate Total	25	19.1%	239	13.3%	37	28.2%	423	23.6%
Middle	81	61.8%	1,140	63.7%	30	22.9%	332	18.5%
Upper	25	19.1%	412	23.0%	62	47.3%	992	55.4%
Unknown	0	0.0%	0	0.0%	2	1.5%	44	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	131	100.0%	1,791	100.0%	131	100.0%	1,791	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	30	20.4%	131	9.3%
Moderate	45	30.6%	282	20.1%	38	25.9%	188	13.4%
Low/Moderate Total	45	30.6%	282	20.1%	68	46.3%	319	22.7%
Middle	59	40.1%	487	34.7%	37	25.2%	413	29.4%
Upper	43	29.3%	635	45.2%	37	25.2%	580	41.3%
Unknown	0	0.0%	0	0.0%	5	3.4%	92	6.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	147	100.0%	1,404	100.0%	147	100.0%	1,404	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	70	12.7%	812	8.4%
Moderate	126	22.9%	2,169	22.3%	107	19.4%	1,362	14.0%
Low/Moderate Total	126	22.9%	2,169	22.3%	177	32.1%	2,174	22.4%
Middle	303	55.0%	5,354	55.1%	134	24.3%	2,281	23.5%
Upper	122	22.1%	2,191	22.6%	227	41.2%	4,954	51.0%
Unknown	0	0.0%	0	0.0%	13	2.4%	305	3.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	551	100.0%	9,714	100.0%	551	100.0%	9,714	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Hardin-Miles City, MT

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							

Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	11	4.7%	153	2.8%
Moderate	48	20.3%	1,379	25.3%	46	19.5%	869	15.9%
Low/Moderate Total	48	20.3%	1,379	25.3%	57	24.2%	1,022	18.7%
Middle	151	64.0%	3,181	58.4%	71	30.1%	1,525	28.0%
Upper	37	15.7%	891	16.3%	105	44.5%	2,858	52.4%
Unknown	0	0.0%	0	0.0%	3	1.3%	46	0.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	236	100.0%	5,451	100.0%	236	100.0%	5,451	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	11	9.9%	119	6.1%
Moderate	26	23.4%	346	17.8%	14	12.6%	199	10.2%
Low/Moderate Total	26	23.4%	346	17.8%	25	22.5%	318	16.3%
Middle	61	55.0%	1,009	51.8%	27	24.3%	397	20.4%
Upper	24	21.6%	592	30.4%	57	51.4%	1,181	60.7%
Unknown	0	0.0%	0	0.0%	2	1.8%	51	2.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	111	100.0%	1,947	100.0%	111	100.0%	1,947	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	10	9.6%	34	2.9%
Moderate	23	22.1%	155	13.2%	34	32.7%	354	30.2%
Low/Moderate Total	23	22.1%	155	13.2%	44	42.3%	388	33.1%
Middle	45	43.3%	590	50.3%	22	21.2%	272	23.2%
Upper	36	34.6%	428	36.5%	32	30.8%	423	36.1%
Unknown	0	0.0%	0	0.0%	6	5.8%	90	7.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	104	100.0%	1,173	100.0%	104	100.0%	1,173	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	32	7.1%	306	3.6%
Moderate	97	21.5%	1,880	21.9%	94	20.8%	1,422	16.6%
Low/Moderate Total	97	21.5%	1,880	21.9%	126	27.9%	1,728	20.2%
Middle	257	57.0%	4,780	55.8%	120	26.6%	2,194	25.6%
Upper	97	21.5%	1,911	22.3%	194	43.0%	4,462	52.1%
Unknown	0	0.0%	0	0.0%	11	2.4%	187	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	451	100.0%	8,571	100.0%	451	100.0%	8,571	100.0%

2020 Hardin-Miles City, MT AA Demographics

2020 Hardin-Miles City, MT 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	1,963	23.9
Moderate	4	26.7	1,705	20.8	515	30.2	1,381	16.8
Middle	9	60.0	5,291	64.5	657	12.4	1,601	19.5
Upper	2	13.3	1,209	14.7	84	6.9	3,260	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**15**	**100.0**	**8,205**	**100.0**	**1,256**	**15.3**	**8,205**	**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	3,121	1,250	16.1	40.1	920	29.5	951	30.5
Middle	9,392	5,214	67.0	55.5	2,718	28.9	1,460	15.5
Upper	1,854	1,321	17.0	71.3	275	14.8	258	13.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**14,367**	**7,785**	**100.0**	**54.2**	**3,913**	**27.2**	**2,669**	**18.6**

	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	101	9.5	83	8.7	14	15.1	4	22.2
Middle	803	75.7	724	76.2	67	72.0	12	66.7
Upper	157	14.8	143	15.1	12	12.9	2	11.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,061**	**100.0**	**950**	**100.0**	**93**	**100.0**	**18**	**100.0**
Percentage of Total Businesses:				**89.5**		**8.8**		**1.7**

	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	33	15.3	33	15.5	0	0.0	0	0.0
Middle	129	60.0	127	59.6	1	100.0	1	100.0

2020 Hardin-Miles City, MT AA Demographics								
Upper	53	24.7	53	24.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**215**	**100.0**	**213**	**100.0**	**1**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.1**		**0.5**		**0.5**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Helena, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.3	0	0.0	0.9	1	0.7	2.2	172	0.4	1.8	3.5
Middle	81	52.3	53.2	19,964	51.7	52.7	84	56.4	53.5	22,373	57.2	53.8	53.9
Upper	74	47.7	45.4	18,636	48.3	46.4	64	43.0	44.2	16,593	42.4	44.4	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	155	100.0	100.0	38,600	100.0	100.0	149	100.0	100.0	39,138	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	2.7	3.1	315	2.0	2.6	3	1.0	2.4	333	0.5	2.0	3.5
Middle	42	56.0	55.2	9,023	55.9	56.1	141	48.8	52.0	34,396	51.5	51.9	53.9
Upper	31	41.3	41.7	6,815	42.2	41.3	145	50.2	45.5	32,113	48.0	46.1	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	75	100.0	100.0	16,153	100.0	100.0	289	100.0	100.0	66,842	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.2	0	0.0	1.4	0	0.0	2.6	0	0.0	5.6	3.5
Middle	13	59.1	55.1	1,414	81.5	61.5	16	48.5	53.9	1,071	49.1	53.6	53.9
Upper	9	40.9	42.8	321	18.5	37.1	17	51.5	43.5	1,112	50.9	40.7	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	1,735	100.0	100.0	33	100.0	100.0	2,183	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Helena, MT													
Middle	2	66.7	55.6	12,583	60.7	45.4	0	0.0	52.9	0	0.0	73.7	65.6
Upper	1	33.3	44.4	8,132	39.3	54.6	3	100.0	47.1	4,410	100.0	26.3	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	20,715	100.0	100.0	3	100.0	100.0	4,410	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	0.7	2.0	315	0.4	1.4	5	1.0	2.3	755	0.7	1.9	3.5
Middle	149	54.2	54.5	44,008	55.9	53.9	248	50.7	52.7	58,314	51.0	53.3	53.9
Upper	124	45.1	43.5	34,388	43.7	44.6	236	48.3	44.9	55,252	48.3	44.8	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	275	100.0	100.0	78,711	100.0	100.0	489	100.0	100.0	114,321	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Helena, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.9	0	0.0	2.7	1	7.7	1.6	250	21.2	5.1	3.5
Middle	9	64.3	56.5	916	72.2	55.5	6	46.2	55.6	398	33.7	52.9	53.9
Upper	5	35.7	40.6	353	27.8	41.8	6	46.2	42.9	532	45.1	41.9	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,269	100.0	100.0	13	100.0	100.0	1,180	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.5	0	0.0	1.4	0	0.0	3.8	0	0.0	1.0	3.5
Middle	2	33.3	62.5	108	45.2	73.6	1	50.0	38.5	76	13.4	46.1	53.9
Upper	4	66.7	35.0	131	54.8	25.0	1	50.0	57.7	492	86.6	52.9	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	239	100.0	100.0	2	100.0	100.0	568	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.5

Middle	0	0.0	74.1	0	0.0	72.1	0	0.0	60.7	0	0.0	60.2	53.9
Upper	0	0.0	25.9	0	0.0	27.9	0	0.0	39.3	0	0.0	39.8	42.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Helena, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	2.6	1.3	398	1.0	0.6	4	2.7	1.6	701	1.8	1.0	14.7
Moderate	23	14.8	13.7	4,077	10.6	10.3	25	16.8	15.2	5,105	13.0	11.4	14.5
Middle	48	31.0	23.8	10,965	28.4	21.2	40	26.8	24.4	9,586	24.5	22.1	22.0
Upper	75	48.4	43.8	21,793	56.5	49.7	74	49.7	44.0	21,639	55.3	49.5	48.8
Unknown	5	3.2	17.4	1,367	3.5	18.2	6	4.0	14.7	2,107	5.4	16.1	0.0
Total	155	100.0	100.0	38,600	100.0	100.0	149	100.0	100.0	39,138	100.0	100.0	100.0
Refinance Loans													
Low	3	4.0	3.1	141	0.9	1.8	5	1.7	1.9	638	1.0	1.2	14.7
Moderate	7	9.3	10.5	1,174	7.3	7.7	27	9.3	8.2	4,707	7.0	5.9	14.5
Middle	17	22.7	21.0	3,027	18.7	18.2	69	23.9	17.6	14,252	21.3	15.0	22.0
Upper	41	54.7	40.0	9,788	60.6	43.4	166	57.4	42.8	42,069	62.9	45.8	48.8
Unknown	7	9.3	25.3	2,023	12.5	28.8	22	7.6	29.4	5,176	7.7	32.1	0.0
Total	75	100.0	100.0	16,153	100.0	100.0	289	100.0	100.0	66,842	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.9	0	0.0	5.6	2	6.1	7.8	140	6.4	8.4	14.7
Moderate	1	4.5	10.1	20	1.2	8.0	5	15.2	16.5	215	9.8	12.5	14.5
Middle	6	27.3	23.9	169	9.7	13.5	7	21.2	20.9	598	27.4	17.5	22.0
Upper	15	68.2	59.4	1,546	89.1	68.3	18	54.5	49.6	1,205	55.2	57.9	48.8
Unknown	0	0.0	3.6	0	0.0	4.6	1	3.0	5.2	25	1.1	3.7	0.0
Total	22	100.0	100.0	1,735	100.0	100.0	33	100.0	100.0	2,183	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	2.6	2.0	539	0.9	1.1	11	2.3	2.0	1,479	1.3	1.2	14.7
Moderate	31	11.4	12.0	5,271	9.1	9.2	59	12.1	11.1	10,104	9.2	8.3	14.5
Middle	78	28.7	22.7	14,624	25.2	19.9	117	24.1	20.1	24,456	22.3	17.9	22.0
Upper	144	52.9	43.5	34,172	58.9	47.7	270	55.6	43.4	66,564	60.6	47.3	48.8
Unknown	12	4.4	19.7	3,390	5.8	22.1	29	6.0	23.5	7,308	6.6	25.4	0.0
Total	272	100.0	100.0	57,996	100.0	100.0	486	100.0	100.0	109,911	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Helena, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.4	0	0.0	1.3	0	0.0	1.6	0	0.0	0.7	14.7
Moderate	0	0.0	7.2	0	0.0	3.1	2	15.4	12.7	77	6.5	14.8	14.5
Middle	6	42.9	31.9	433	34.1	28.0	1	7.7	20.6	20	1.7	19.9	22.0
Upper	8	57.1	58.0	836	65.9	67.1	10	76.9	63.5	1,083	91.8	63.7	48.8
Unknown	0	0.0	1.4	0	0.0	0.5	0	0.0	1.6	0	0.0	0.9	0.0
Total	14	100.0	100.0	1,269	100.0	100.0	13	100.0	100.0	1,180	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.5	0	0.0	0.9	0	0.0	7.7	0	0.0	1.5	14.7
Moderate	0	0.0	10.0	0	0.0	7.9	0	0.0	7.7	0	0.0	5.8	14.5
Middle	1	16.7	20.0	30	12.6	17.6	0	0.0	11.5	0	0.0	9.5	22.0
Upper	5	83.3	65.0	209	87.4	69.8	2	100.0	73.1	568	100.0	83.2	48.8
Unknown	0	0.0	2.5	0	0.0	3.8	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	239	100.0	100.0	2	100.0	100.0	568	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	48.8
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Helena, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.8	0	0.0	0.8	2	0.6	2.5	100	0.3	0.7	2.3
Middle	65	65.0	60.2	8,831	56.4	61.8	223	61.8	60.7	23,796	67.7	63.4	61.0
Upper	35	35.0	34.3	6,820	43.6	35.8	136	37.7	35.7	11,275	32.1	35.0	36.7

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Helena, MT													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.7	0	0.0	1.6	0	0.0	1.1	0	0.0	0.9	
Total	100	100.0	100.0	15,651	100.0	100.0	361	100.0	100.0	35,171	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Helena, MT													
	Bank And Aggregate Loans By Year												**Total Businesses %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	56	56.0	49.0	3,858	24.7	46.2	44	12.2	57.6	4,326	12.3	39.5	90.9
Over $1 Million	32	32.0		11,222	71.7		57	15.8		11,711	33.3		6.6
Revenue Unknown	12	12.0		571	3.6		260	72.0		19,134	54.4		2.5
Total	100	100.0		15,651	100.0		361	100.0		35,171	100.0		100.0
By Loan Size													
$100,000 or Less	68	68.0	91.3	2,568	16.4	36.5	267	74.0	89.1	9,172	26.1	36.5	
$100,001 - $250,000	14	14.0	4.9	2,532	16.2	19.6	52	14.4	6.1	8,257	23.5	18.3	
$250,001 - $1 Million	18	18.0	3.7	10,551	67.4	44.0	42	11.6	4.8	17,742	50.4	45.2	
Total	100	100.0	100.0	15,651	100.0	100.0	361	100.0	100.0	35,171	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	47	83.9		1,667	43.2		33	75.0		892	20.6		
$100,001 - $250,000	5	8.9		883	22.9		5	11.4		951	22.0		
$250,001 - $1 Million	4	7.1		1,308	33.9		6	13.6		2,483	57.4		
Total	56	100.0		3,858	100.0		44	100.0		4,326	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Helena, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.2	0	0.0	16.2	0	0.0	25.7	0	0.0	32.0	22.7
Middle	2	40.0	47.8	35	22.2	42.3	2	66.7	52.9	67	72.8	43.3	44.5
Upper	3	60.0	30.4	123	77.8	37.3	1	33.3	20.0	25	27.2	23.9	32.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	6.5	0	0.0	4.1	0	0.0	1.4	0	0.0	0.8	
Total	5	100.0	100.0	158	100.0	100.0	3	100.0	100.0	92	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Helena, MT

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	5	100.0	67.4	158	100.0	92.8	3	100.0	62.9	92	100.0	90.0	99.2
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.8
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	5	100.0		158	100.0		3	100.0		92	100.0		100.0
By Loan Size													
$100,000 or Less	5	100.0	95.7	158	100.0	74.4	3	100.0	90.0	92	100.0	42.1	
$100,001 - $250,000	0	0.0	4.3	0	0.0	25.6	0	0.0	5.7	0	0.0	22.4	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	4.3	0	0.0	35.5	
Total	5	100.0	100.0	158	100.0	100.0	3	100.0	100.0	92	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	5	100.0		158	100.0		3	100.0		92	100.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Helena, MT													
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	5	100.0		158	100.0		3	100.0		92	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Helena, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	12	8.1%	169	5.0%
Moderate	0	0.0%	0	0.0%	33	22.1%	578	17.0%
Low/Moderate Total	0	0.0%	0	0.0%	45	30.2%	747	22.0%
Middle	93	62.4%	2,066	60.8%	43	28.9%	880	25.9%
Upper	56	37.6%	1,334	39.2%	60	40.3%	1,756	51.6%
Unknown	0	0.0%	0	0.0%	1	0.7%	17	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	149	100.0%	3,400	100.0%	149	100.0%	3,400	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	2	3.9%	15	1.4%
Moderate	4	7.8%	107	10.1%	4	7.8%	39	3.7%
Low/Moderate Total	4	7.8%	107	10.1%	6	11.8%	54	5.1%
Middle	29	56.9%	700	66.1%	12	23.5%	159	15.0%
Upper	18	35.3%	252	23.8%	30	58.8%	800	75.5%
Unknown	0	0.0%	0	0.0%	3	5.9%	46	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	51	100.0%	1,059	100.0%	51	100.0%	1,059	100.0%
	Other - Unsecured							

Low	0	0.0%	0	0.0%	7	10.4%	63	9.0%
Moderate	2	3.0%	33	4.7%	20	29.9%	147	20.9%
Low/Moderate Total	2	3.0%	33	4.7%	27	40.3%	210	29.9%
Middle	31	46.3%	302	43.0%	18	26.9%	169	24.1%
Upper	34	50.7%	367	52.3%	19	28.4%	285	40.6%
Unknown	0	0.0%	0	0.0%	3	4.5%	38	5.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	67	100.0%	702	100.0%	67	100.0%	702	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	21	7.9%	247	4.8%
Moderate	6	2.2%	140	2.7%	57	21.3%	764	14.8%
Low/Moderate Total	6	2.2%	140	2.7%	78	29.2%	1,011	19.6%
Middle	153	57.3%	3,068	59.4%	73	27.3%	1,208	23.4%
Upper	108	40.4%	1,953	37.8%	109	40.8%	2,841	55.0%
Unknown	0	0.0%	0	0.0%	7	2.6%	101	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	267	100.0%	5,161	100.0%	267	100.0%	5,161	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Helena, MT

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	3	1.8%	35	0.8%
Moderate	1	0.6%	6	0.1%	31	19.0%	660	16.0%
Low/Moderate Total	1	0.6%	6	0.1%	34	20.9%	695	16.9%
Middle	95	58.3%	2,445	59.4%	42	25.8%	837	20.3%
Upper	67	41.1%	1,668	40.5%	86	52.8%	2,578	62.6%
Unknown	0	0.0%	0	0.0%	1	0.6%	9	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	163	100.0%	4,119	100.0%	163	100.0%	4,119	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	8	11.3%	95	6.0%
Moderate	2	2.8%	55	3.5%	9	12.7%	153	9.7%
Low/Moderate Total	2	2.8%	55	3.5%	17	23.9%	248	15.7%

Middle	45	63.4%	1,007	63.7%	13	18.3%	244	15.4%
Upper	24	33.8%	520	32.9%	39	54.9%	1,004	63.5%
Unknown	0	0.0%	0	0.0%	2	2.8%	86	5.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	71	100.0%	1,582	100.0%	71	100.0%	1,582	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	7	11.7%	58	7.2%
Moderate	1	1.7%	23	2.9%	12	20.0%	113	14.1%
Low/Moderate Total	1	1.7%	23	2.9%	19	31.7%	171	21.3%
Middle	38	63.3%	494	61.7%	13	21.7%	146	18.2%
Upper	21	35.0%	284	35.5%	22	36.7%	433	54.1%
Unknown	0	0.0%	0	0.0%	6	10.0%	51	6.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	60	100.0%	801	100.0%	60	100.0%	801	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	18	6.1%	188	2.9%
Moderate	4	1.4%	84	1.3%	52	17.7%	926	14.2%
Low/Moderate Total	4	1.4%	84	1.3%	70	23.8%	1,114	17.1%
Middle	178	60.5%	3,946	60.7%	68	23.1%	1,227	18.9%
Upper	112	38.1%	2,472	38.0%	147	50.0%	4,015	61.8%
Unknown	0	0.0%	0	0.0%	9	3.1%	146	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	294	100.0%	6,502	100.0%	294	100.0%	6,502	100.0%

2020 Helena, MT 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	2,460	14.7
Moderate	1	7.1	565	3.4	62	11.0	2,425	14.5
Middle	8	57.1	8,830	52.8	771	8.7	3,670	22.0
Upper	5	35.7	7,323	43.8	559	7.6	8,163	48.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**14**	**100.0**	**16,718**	**100.0**	**1,392**	**8.3**	**16,718**	**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	1,654	646	3.5	39.1	188	11.4	820	49.6
Middle	17,033	9,996	53.9	58.7	4,986	29.3	2,051	12.0
Upper	11,867	7,916	42.7	66.7	3,021	25.5	930	7.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0

2020 Helena, MT AA Demographics								
Total AA	**30,554**	**18,558**	**100.0**	**60.7**	**8,195**	**26.8**	**3,801**	**12.4**

	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	100	2.3	95	2.4	3	1.1	2	1.9
Middle	2,606	61.0	2,340	60.2	179	63.3	87	82.9
Upper	1,568	36.7	1,451	37.3	101	35.7	16	15.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,274**	**100.0**	**3,886**	**100.0**	**283**	**100.0**	**105**	**100.0**
Percentage of Total Businesses:				**90.9**		**6.6**		**2.5**

	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	29	22.7	28	22.0	1	100.0	0	0.0
Middle	57	44.5	57	44.9	0	0.0	0	0.0
Upper	42	32.8	42	33.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**128**	**100.0**	**127**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Hood River, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	28.2	168	100.0	28.4	0	0.0	24.1	0	0.0	25.1	19.7
Upper	0	0.0	71.8	0	0.0	71.6	1	100.0	75.9	514	100.0	74.9	80.3

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Hood River, OR													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	168	100.0	100.0	1	100.0	100.0	514	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	23.3	0	0.0	22.7	0	0.0	28.0	0	0.0	28.0	19.7
Upper	0	0.0	76.7	0	0.0	77.3	3	100.0	72.0	876	100.0	72.0	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	876	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	34.3	250	100.0	35.1	2	66.7	21.4	50	45.5	28.4	19.7
Upper	0	0.0	65.7	0	0.0	64.9	1	33.3	78.6	60	54.5	71.6	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	250	100.0	100.0	3	100.0	100.0	110	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	66.8
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	27.0	535	100.0	26.7	2	28.6	26.8	50	3.3	27.2	19.7
Upper	0	0.0	73.0	0	0.0	73.3	5	71.4	73.2	1,450	96.7	72.8	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	535	100.0	100.0	7	100.0	100.0	1,500	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Hood River, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	38.8	117	100.0	43.8	0	0.0	27.8	0	0.0	27.7	19.7
Upper	0	0.0	61.2	0	0.0	56.2	0	0.0	72.2	0	0.0	72.3	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	117	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	23.1	0	0.0	26.3	0	0.0	37.5	0	0.0	41.1	19.7
Upper	0	0.0	76.9	0	0.0	73.7	0	0.0	62.5	0	0.0	58.9	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	16.7	0	0.0	55.4	0	0.0	0.0	0	0.0	0.0	19.7
Upper	0	0.0	83.3	0	0.0	44.6	0	0.0	100.0	0	0.0	100.0	80.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Hood River, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.6	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	11.8
Moderate	0	0.0	5.0	0	0.0	2.7	0	0.0	3.7	0	0.0	2.1	11.8
Middle	0	0.0	10.6	0	0.0	7.5	0	0.0	17.6	0	0.0	13.5	21.6

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Hood River, OR													
Upper	1	100.0	73.0	168	100.0	79.5	1	100.0	70.0	514	100.0	75.5	54.8
Unknown	0	0.0	10.9	0	0.0	9.8	0	0.0	8.5	0	0.0	8.6	0.0
Total	1	100.0	100.0	168	100.0	100.0	1	100.0	100.0	514	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.4	0	0.0	2.0	0	0.0	0.7	0	0.0	0.3	11.8
Moderate	0	0.0	5.7	0	0.0	3.1	0	0.0	6.4	0	0.0	4.0	11.8
Middle	0	0.0	11.6	0	0.0	8.0	0	0.0	17.6	0	0.0	14.1	21.6
Upper	0	0.0	64.6	0	0.0	71.2	2	66.7	63.5	580	66.2	69.9	54.8
Unknown	0	0.0	14.7	0	0.0	15.8	1	33.3	11.8	296	33.8	11.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	876	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.5	0	0.0	2.9	0	0.0	2.4	0	0.0	0.3	11.8
Moderate	0	0.0	7.5	0	0.0	4.2	0	0.0	2.4	0	0.0	5.2	11.8
Middle	0	0.0	17.9	0	0.0	17.2	1	33.3	11.9	20	18.2	8.5	21.6
Upper	1	100.0	68.7	250	100.0	71.3	2	66.7	78.6	90	81.8	77.8	54.8
Unknown	0	0.0	1.5	0	0.0	4.4	0	0.0	4.8	0	0.0	8.1	0.0
Total	1	100.0	100.0	250	100.0	100.0	3	100.0	100.0	110	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.0	0	0.0	1.2	0	0.0	0.7	0	0.0	0.3	11.8
Moderate	0	0.0	5.1	0	0.0	2.8	0	0.0	5.6	0	0.0	3.4	11.8
Middle	1	33.3	11.9	117	21.9	8.3	1	14.3	17.1	20	1.3	13.6	21.6
Upper	2	66.7	69.5	418	78.1	75.1	5	71.4	65.5	1,184	78.9	71.6	54.8
Unknown	0	0.0	11.5	0	0.0	12.6	1	14.3	11.2	296	19.7	11.1	0.0
Total	3	100.0	100.0	535	100.0	100.0	7	100.0	100.0	1,500	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Hood River, OR													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Moderate	0	0.0	1.5	0	0.0	1.3	0	0.0	5.6	0	0.0	4.1	11.8
Middle	1	100.0	10.4	117	100.0	9.2	0	0.0	8.3	0	0.0	6.5	21.6
Upper	0	0.0	85.1	0	0.0	87.7	0	0.0	75.0	0	0.0	75.4	54.8
Unknown	0	0.0	3.0	0	0.0	1.8	0	0.0	11.1	0	0.0	14.0	0.0
Total	1	100.0	100.0	117	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Hood River, OR													
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.3	0	0.0	2.1	11.8
Moderate	0	0.0	3.8	0	0.0	2.2	0	0.0	6.3	0	0.0	1.5	11.8
Middle	0	0.0	23.1	0	0.0	19.8	0	0.0	12.5	0	0.0	6.6	21.6
Upper	0	0.0	73.1	0	0.0	78.0	0	0.0	68.8	0	0.0	83.3	54.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	6.3	0	0.0	6.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	11.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	54.8
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Hood River, OR													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Businesses %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	10	58.8	44.0	2,275	56.1	42.4	60	34.7	50.5	5,369	37.5	47.4	47.4
Upper	7	41.2	54.1	1,783	43.9	55.7	113	65.3	49.1	8,959	62.5	52.5	52.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	1.9	0	0.0	0.5	0	0.0	0.1	
Total	17	100.0	100.0	4,058	100.0	100.0	173	100.0	100.0	14,328	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Hood River, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	8	47.1	55.8	603	14.9	40.6	21	12.1	48.2	1,536	10.7	27.3	93.7
Over $1 Million	9	52.9		3,455	85.1		5	2.9		1,012	7.1		5.4
Revenue Unknown	0	0.0		0	0.0		147	85.0		11,780	82.2		0.9
Total	17	100.0		4,058	100.0		173	100.0		14,328	100.0		100.0
By Loan Size													
$100,000 or Less	9	52.9	93.9	260	6.4	35.5	133	76.9	87.2	4,226	29.5	34.3	
$100,001 - $250,000	4	23.5	2.9	698	17.2	13.8	29	16.8	8.2	4,631	32.3	24.3	
$250,001 - $1 Million	4	23.5	3.2	3,100	76.4	50.7	11	6.4	4.6	5,471	38.2	41.4	
Total	17	100.0	100.0	4,058	100.0	100.0	173	100.0	100.0	14,328	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	5	62.5		155	25.7		18	85.7		586	38.2		
$100,001 - $250,000	3	37.5		448	74.3		2	9.5		400	26.0		
$250,001 - $1 Million	0	0.0		0	0.0		1	4.8		550	35.8		
Total	8	100.0		603	100.0		21	100.0		1,536	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Hood River, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	1.4	0	0.0	2.2	0	0.0	0.0	0	0.0	0.0	3.5
Upper	12	100.0	97.3	1,102	100.0	97.6	15	100.0	100.0	1,953	100.0	100.0	96.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Hood River, OR

Tract-Unk	0	0.0	1.4	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,102	100.0	100.0	15	100.0	100.0	1,953	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Hood River, OR

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	9	75.0	73.0	498	45.2	68.0	11	73.3	73.6	1,447	74.1	74.5	93.0
Over $1 Million	2	16.7		579	52.5		4	26.7		506	25.9		7.0
Revenue Unknown	1	8.3		25	2.3		0	0.0		0	0.0		0.0
Total	12	100.0		1,102	100.0		15	100.0		1,953	100.0		100.0
By Loan Size													
$100,000 or Less	8	66.7	82.4	248	22.5	31.5	8	53.3	72.6	316	16.2	25.5	
$100,001 - $250,000	2	16.7	10.8	275	25.0	27.0	4	26.7	17.9	737	37.7	32.9	
$250,001 - $500,000	2	16.7	6.8	579	52.5	41.5	3	20.0	9.4	900	46.1	41.6	
Total	12	100.0	100.0	1,102	100.0	100.0	15	100.0	100.0	1,953	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	7	77.8		223	44.8		6	54.5		250	17.3		
$100,001 - $250,000	2	22.2		275	55.2		3	27.3		597	41.3		
$250,001 - $500,000	0	0.0		0	0.0		2	18.2		600	41.5		
Total	9	100.0		498	100.0		11	100.0		1,447	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Hood River, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	26	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	26	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	26	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	26	100.0%	1	100.0%	26	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	8	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	8	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	8	100.0%	1	100.0%	8	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	75	100.0%	1	100.0%	75	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	75	100.0%	1	100.0%	75	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	26	23.9%
Low/Moderate Total	0	0.0%	0	0.0%	1	33.3%	26	23.9%

Middle	1	33.3%	8	7.3%	0	0.0%	0	0.0%
Upper	2	66.7%	101	92.7%	2	66.7%	83	76.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	109	100.0%	3	100.0%	109	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Hood River, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	5	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	5	100.0%	1	100.0%	5	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Consumer Loan Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	5	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	5	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	5	100.0%	1	100.0%	5	100.0%

2020 Hood River, OR 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	620	11.8
Moderate	0	0.0	0	0.0	0	0.0	620	11.8
Middle	1	25.0	1,347	25.6	298	22.1	1,135	21.6
Upper	3	75.0	3,912	74.4	174	4.4	2,884	54.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**5,259**	**100.0**	**472**	**9.0**	**5,259**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,685	1,047	19.7	39.0	1,315	49.0	323	12.0
Upper	6,773	4,266	80.3	63.0	1,561	23.0	946	14.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**9,458**	**5,313**	**100.0**	**56.2**	**2,876**	**30.4**	**1,269**	**13.4**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	866	47.4	813	47.5	50	50.5	3	18.8
Upper	962	52.6	900	52.5	49	49.5	13	81.3

2020 Hood River, OR AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,828**	**100.0**	**1,713**	**100.0**	**99**	**100.0**	**16**	**100.0**
Percentage of Total Businesses:				**93.7**		**5.4**		**0.9**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	7	3.5	7	3.7	0	0.0	0	0.0
Upper	194	96.5	180	96.3	14	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**201**	**100.0**	**187**	**100.0**	**14**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**93.0**		**7.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Jackson, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	23	51.1	45.9	12,630	33.2	42.7	18	51.4	38.2	8,874	47.0	32.0	39.5
Upper	22	48.9	54.1	25,364	66.8	57.3	17	48.6	61.8	10,022	53.0	68.0	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	37,994	100.0	100.0	35	100.0	100.0	18,896	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	26	55.3	48.2	8,510	59.5	30.2	75	56.0	46.9	27,359	56.7	39.1	39.5
Upper	21	44.7	51.8	5,802	40.5	69.8	59	44.0	53.1	20,875	43.3	60.9	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	14,312	100.0	100.0	134	100.0	100.0	48,234	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Jackson, WY

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	12	70.6	52.6	2,792	76.3	48.4	11	78.6	61.3	2,076	69.5	71.5	39.5
Upper	5	29.4	47.4	866	23.7	51.6	3	21.4	38.7	910	30.5	28.5	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	3,658	100.0	100.0	14	100.0	100.0	2,986	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	50.0	0	0.0	22.4	0	0.0	40.0	0	0.0	20.8	52.2
Upper	0	0.0	50.0	0	0.0	77.6	1	100.0	40.0	4,000	100.0	12.0	47.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	20.0	0	0.0	67.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	4,000	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	65	56.5	47.9	24,258	42.9	36.0	108	56.5	44.4	38,929	50.5	33.5	39.5
Upper	50	43.5	52.1	32,255	57.1	64.0	83	43.5	55.5	38,176	49.5	63.8	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	2.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	115	100.0	100.0	56,513	100.0	100.0	191	100.0	100.0	77,105	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Jackson, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	60.0	55.6	250	52.9	46.3	4	57.1	56.7	620	20.7	34.8	39.5
Upper	2	40.0	44.4	223	47.1	53.7	3	42.9	43.3	2,369	79.3	65.2	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Jackson, WY													
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	473	100.0	100.0	7	100.0	100.0	2,989	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	56.0	76	100.0	58.5	0	0.0	15.9	0	0.0	6.4	39.5
Upper	0	0.0	44.0	0	0.0	41.5	0	0.0	84.1	0	0.0	93.6	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	76	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	25.0	0	0.0	13.7	0	0.0	0.0	0	0.0	0.0	39.5
Upper	0	0.0	75.0	0	0.0	86.3	0	0.0	100.0	0	0.0	100.0	60.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Jackson, WY													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.1	10.4
Moderate	2	4.4	3.9	525	1.4	1.3	6	17.1	3.7	1,743	9.2	0.9	12.5
Middle	10	22.2	13.8	3,465	9.1	7.7	7	20.0	7.9	2,728	14.4	2.6	22.3
Upper	28	62.2	70.3	18,101	47.6	74.4	21	60.0	73.4	14,176	75.0	77.8	54.8
Unknown	5	11.1	12.0	15,903	41.9	16.7	1	2.9	14.7	249	1.3	18.6	0.0
Total	45	100.0	100.0	37,994	100.0	100.0	35	100.0	100.0	18,896	100.0	100.0	100.0
Refinance Loans													
Low	3	6.4	2.0	348	2.4	0.5	3	2.2	1.4	383	0.8	0.6	10.4
Moderate	6	12.8	4.7	1,256	8.8	1.4	13	9.7	4.6	2,495	5.2	2.2	12.5
Middle	8	17.0	10.6	902	6.3	3.9	21	15.7	13.6	6,138	12.7	6.6	22.3
Upper	29	61.7	66.7	11,776	82.3	70.8	88	65.7	66.8	36,147	74.9	73.8	54.8
Unknown	1	2.1	16.1	30	0.2	23.5	9	6.7	13.6	3,071	6.4	16.9	0.0
Total	47	100.0	100.0	14,312	100.0	100.0	134	100.0	100.0	48,234	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Jackson, WY

Home Improvement Loans													
Low	0	0.0	2.6	0	0.0	3.5	0	0.0	3.2	0	0.0	0.6	10.4
Moderate	1	5.9	2.6	35	1.0	0.4	2	14.3	6.5	60	2.0	0.5	12.5
Middle	1	5.9	13.2	85	2.3	5.5	1	7.1	3.2	440	14.7	3.9	22.3
Upper	13	76.5	73.7	3,138	85.8	69.0	11	78.6	87.1	2,486	83.3	95.0	54.8
Unknown	2	11.8	7.9	400	10.9	21.6	0	0.0	0.0	0	0.0	0.0	0.0
Total	17	100.0	100.0	3,658	100.0	100.0	14	100.0	100.0	2,986	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	2.6	1.4	348	0.6	0.6	3	1.6	1.2	383	0.5	0.4	10.4
Moderate	9	7.8	4.2	1,816	3.2	1.3	22	11.6	4.2	4,318	5.9	1.5	12.5
Middle	20	17.4	11.9	4,577	8.1	4.9	29	15.3	11.4	9,306	12.7	4.6	22.3
Upper	75	65.2	67.8	33,439	59.2	72.1	126	66.3	69.6	55,778	76.3	76.0	54.8
Unknown	8	7.0	14.7	16,333	28.9	21.1	10	5.3	13.6	3,320	4.5	17.5	0.0
Total	115	100.0	100.0	56,513	100.0	100.0	190	100.0	100.0	73,105	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Jackson, WY

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	5.6	0	0.0	7.6	0	0.0	3.3	0	0.0	0.4	10.4
Moderate	0	0.0	0.0	0	0.0	0.0	1	14.3	3.3	20	0.7	0.2	12.5
Middle	1	20.0	27.8	125	26.4	12.2	0	0.0	3.3	0	0.0	2.8	22.3
Upper	4	80.0	61.1	348	73.6	72.2	6	85.7	90.0	2,969	99.3	96.7	54.8
Unknown	0	0.0	5.6	0	0.0	8.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	473	100.0	100.0	7	100.0	100.0	2,989	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.0	0	0.0	3.1	0	0.0	0.0	0	0.0	0.0	10.4
Moderate	0	0.0	4.0	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	12.5
Middle	0	0.0	4.0	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	22.3
Upper	1	100.0	68.0	76	100.0	74.1	0	0.0	79.5	0	0.0	79.9	54.8
Unknown	0	0.0	20.0	0	0.0	21.8	0	0.0	20.5	0	0.0	20.1	0.0
Total	1	100.0	100.0	76	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	10.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	12.5

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Jackson, WY

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	54.8
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Jackson, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	40	58.8	47.1	3,957	81.6	54.1	293	65.7	56.0	20,697	68.7	54.4	57.6
Upper	28	41.2	36.3	893	18.4	33.6	153	34.3	37.2	9,442	31.3	36.4	42.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	16.5	0	0.0	12.3	0	0.0	6.8	0	0.0	9.2	
Total	68	100.0	100.0	4,850	100.0	100.0	446	100.0	100.0	30,139	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Jackson, WY

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	33	48.5	46.7	1,422	29.3	38.0	34	7.6	44.3	2,694	8.9	33.5	88.8
Over $1 Million	26	38.2		3,118	64.3		18	4.0		2,045	6.8		10.1
Revenue Unknown	9	13.2		310	6.4		394	88.3		25,400	84.3		1.1

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Jackson, WY													
Total	68	100.0		4,850	100.0		446	100.0		30,139	100.0		100.0
By Loan Size													
$100,000 or Less	64	94.1	96.9	2,380	49.1	56.4	377	84.5	92.4	11,628	38.6	46.6	
$100,001 - $250,000	1	1.5	1.3	200	4.1	7.8	44	9.9	4.6	6,916	22.9	17.0	
$250,001 - $1 Million	3	4.4	1.8	2,270	46.8	35.7	25	5.6	3.1	11,595	38.5	36.4	
Total	68	100.0	100.0	4,850	100.0	100.0	446	100.0	100.0	30,139	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	32	97.0		1,152	81.0		31	91.2		1,064	39.5		
$100,001 - $250,000	0	0.0		0	0.0		1	2.9		200	7.4		
$250,001 - $1 Million	1	3.0		270	19.0		2	5.9		1,430	53.1		
Total	33	100.0		1,422	100.0		34	100.0		2,694	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Jackson, WY													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	25.0	0	0.0	33.5	0	0.0	21.1	0	0.0	14.6	47.4
Upper	1	100.0	62.5	45	100.0	57.0	3	100.0	73.7	105	100.0	82.2	52.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.5	0	0.0	9.5	0	0.0	5.3	0	0.0	3.2	
Total	1	100.0	100.0	45	100.0	100.0	3	100.0	100.0	105	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms

Assessment Area: Jackson, WY													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	37.5	0	0.0	20.3	3	100.0	63.2	105	100.0	55.6	100.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Revenue Unknown	1	100.0		45	100.0		0	0.0		0	0.0		0.0
Total	1	100.0		45	100.0		3	100.0		105	100.0		100.0
By Loan Size													
$100,000 or Less	1	100.0	100.0	45	100.0	100.0	3	100.0	100.0	105	100.0	100.0	
$100,001 - $250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	45	100.0	100.0	3	100.0	100.0	105	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		3	100.0		105	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		3	100.0		105	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Jackson, WY

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	5	13.5%	159	14.1%
Moderate	0	0.0%	0	0.0%	10	27.0%	227	20.1%
Low/Moderate Total	0	0.0%	0	0.0%	15	40.5%	386	34.3%
Middle	17	45.9%	456	40.5%	5	13.5%	96	8.5%
Upper	20	54.1%	671	59.5%	17	45.9%	645	57.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	37	100.0%	1,127	100.0%	37	100.0%	1,127	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	4	17.4%	75	9.8%
Moderate	0	0.0%	0	0.0%	7	30.4%	98	12.7%
Low/Moderate Total	0	0.0%	0	0.0%	11	47.8%	173	22.5%
Middle	15	65.2%	492	64.0%	1	4.3%	26	3.4%
Upper	8	34.8%	277	36.0%	10	43.5%	320	41.6%
Unknown	0	0.0%	0	0.0%	1	4.3%	250	32.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	769	100.0%	23	100.0%	769	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	8.7%	11	2.9%
Moderate	0	0.0%	0	0.0%	8	34.8%	98	26.2%
Low/Moderate Total	0	0.0%	0	0.0%	10	43.5%	109	29.1%
Middle	16	69.6%	257	68.7%	6	26.1%	109	29.1%
Upper	7	30.4%	117	31.3%	5	21.7%	144	38.5%
Unknown	0	0.0%	0	0.0%	2	8.7%	12	3.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	374	100.0%	23	100.0%	374	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	11	13.3%	245	10.8%
Moderate	0	0.0%	0	0.0%	25	30.1%	423	18.6%
Low/Moderate Total	0	0.0%	0	0.0%	36	43.4%	668	29.4%

Middle	48	57.8%	1,205	53.1%	12	14.5%	231	10.2%
Upper	35	42.2%	1,065	46.9%	32	38.6%	1,109	48.9%
Unknown	0	0.0%	0	0.0%	3	3.6%	262	11.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	83	100.0%	2,270	100.0%	83	100.0%	2,270	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Jackson, WY

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	2	6.9%	38	4.6%
Moderate	0	0.0%	0	0.0%	8	27.6%	175	21.2%
Low/Moderate Total	0	0.0%	0	0.0%	10	34.5%	213	25.8%
Middle	14	48.3%	399	48.2%	9	31.0%	243	29.4%
Upper	15	51.7%	428	51.8%	10	34.5%	371	44.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	827	100.0%	29	100.0%	827	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	3	8.3%	69	9.0%
Moderate	0	0.0%	0	0.0%	14	38.9%	254	33.2%
Low/Moderate Total	0	0.0%	0	0.0%	17	47.2%	323	42.2%
Middle	21	58.3%	565	73.9%	6	16.7%	112	14.6%
Upper	15	41.7%	200	26.1%	13	36.1%	330	43.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	36	100.0%	765	100.0%	36	100.0%	765	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	9.1%	13	6.1%
Moderate	0	0.0%	0	0.0%	2	18.2%	11	5.2%
Low/Moderate Total	0	0.0%	0	0.0%	3	27.3%	24	11.3%
Middle	4	36.4%	40	18.9%	3	27.3%	40	18.9%
Upper	7	63.6%	172	81.1%	5	45.5%	148	69.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	212	100.0%	11	100.0%	212	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	7.9%	120	6.7%
Moderate	0	0.0%	0	0.0%	24	31.6%	440	24.4%
Low/Moderate Total	0	0.0%	0	0.0%	30	39.5%	560	31.0%
Middle	39	51.3%	1,004	55.7%	18	23.7%	395	21.9%
Upper	37	48.7%	800	44.3%	28	36.8%	849	47.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	76	100.0%	1,804	100.0%	76	100.0%	1,804	100.0%

2020 Jackson, WY 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	504	10.4
Moderate	0	0.0	0	0.0	0	0.0	606	12.5
Middle	2	50.0	2,365	48.9	78	3.3	1,078	22.3
Upper	2	50.0	2,475	51.1	37	1.5	2,652	54.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**4,840**	**100.0**	**115**	**2.4**	**4,840**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	5,006	1,954	39.5	39.0	1,792	35.8	1,260	25.2
Upper	8,140	2,999	60.5	36.8	1,442	17.7	3,699	45.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**13,146**	**4,953**	**100.0**	**37.7**	**3,234**	**24.6**	**4,959**	**37.7**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,292	57.6	1,148	57.6	127	56.2	17	68.0
Upper	953	42.4	846	42.4	99	43.8	8	32.0

2020 Jackson, WY AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,245**	**100.0**	**1,994**	**100.0**	**226**	**100.0**	**25**	**100.0**
Percentage of Total Businesses:				**88.8**		**10.1**		**1.1**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	18	47.4	18	47.4	0	0.0	0	0.0
Upper	20	52.6	20	52.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**38**	**100.0**	**38**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Kalispell, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	17	11.6	13.1	3,713	9.1	9.9	9	5.6	0.0	1,983	3.8	0.0	17.2
Middle	114	78.1	75.8	32,454	79.9	78.1	123	76.9	0.0	42,217	80.2	0.0	74.4
Upper	15	10.3	11.1	4,454	11.0	12.0	28	17.5	0.0	8,455	16.1	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	146	100.0	100.0	40,621	100.0	100.0	160	100.0	0.0	52,655	100.0	0.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	14	8.6	11.7	2,250	5.6	9.5	27	8.2	0.0	5,528	6.1	0.0	17.2
Middle	129	79.6	76.4	31,752	79.6	77.3	255	77.3	0.0	72,387	80.2	0.0	74.4
Upper	19	11.7	11.9	5,912	14.8	13.2	48	14.5	0.0	12,370	13.7	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	162	100.0	100.0	39,914	100.0	100.0	330	100.0	0.0	90,285	100.0	0.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Kalispell, MT

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	15.2	12.8	293	10.3	10.4	9	20.0	0.0	779	19.0	0.0	17.2
Middle	38	82.6	78.6	2,545	89.4	82.2	29	64.4	0.0	2,612	63.7	0.0	74.4
Upper	1	2.2	8.6	10	0.4	7.4	7	15.6	0.0	708	17.3	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	2,848	100.0	100.0	45	100.0	0.0	4,099	100.0	0.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.5
Middle	0	0.0	88.9	0	0.0	88.0	2	66.7	0.0	5,827	30.3	0.0	74.9
Upper	1	100.0	11.1	952	100.0	12.0	1	33.3	0.0	13,400	69.7	0.0	7.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	952	100.0	100.0	3	100.0	0.0	19,227	100.0	0.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	40	9.7	12.5	6,301	7.0	9.7	50	8.2	0.0	8,540	4.9	0.0	17.2
Middle	325	78.7	76.1	71,628	79.6	78.0	467	76.8	0.0	131,264	74.8	0.0	74.4
Upper	48	11.6	11.4	12,053	13.4	12.3	91	15.0	0.0	35,741	20.4	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	413	100.0	100.0	89,982	100.0	100.0	608	100.0	0.0	175,545	100.0	0.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Kalispell, MT

Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	3.5	14.8	45	0.8	16.2	5	7.4	0.0	250	2.9	0.0	17.2
Middle	43	75.4	71.1	4,821	86.2	70.5	56	82.4	0.0	7,457	87.6	0.0	74.4
Upper	12	21.1	14.1	725	13.0	13.2	7	10.3	0.0	808	9.5	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Kalispell, MT													
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	5,591	100.0	100.0	68	100.0	0.0	8,515	100.0	0.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	8.3	0	0.0	6.0	0	0.0	0.0	0	0.0	0.0	17.2
Middle	1	100.0	83.3	56	100.0	90.6	2	100.0	0.0	764	100.0	0.0	74.4
Upper	0	0.0	8.3	0	0.0	3.4	0	0.0	0.0	0	0.0	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	56	100.0	100.0	2	100.0	0.0	764	100.0	0.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.8	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	17.2
Middle	0	0.0	88.1	0	0.0	95.2	0	0.0	0.0	0	0.0	0.0	74.4
Upper	0	0.0	7.1	0	0.0	3.2	0	0.0	0.0	0	0.0	0.0	8.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Kalispell, MT													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	5	3.4	2.4	687	1.7	1.1	5	3.1	0.0	724	1.4	0.0	21.3
Moderate	15	10.3	14.0	2,924	7.2	8.7	21	13.1	0.0	3,976	7.6	0.0	20.4
Middle	32	21.9	24.0	7,488	18.4	19.4	28	17.5	0.0	6,616	12.6	0.0	23.4
Upper	85	58.2	48.7	26,591	65.5	60.6	100	62.5	0.0	38,989	74.0	0.0	34.9
Unknown	9	6.2	10.9	2,931	7.2	10.3	6	3.8	0.0	2,350	4.5	0.0	0.0
Total	146	100.0	100.0	40,621	100.0	100.0	160	100.0	0.0	52,655	100.0	0.0	100.0
Refinance Loans													
Low	8	4.9	5.0	842	2.1	2.4	14	4.2	0.0	2,796	3.1	0.0	21.3
Moderate	18	11.1	13.7	2,596	6.5	8.5	36	10.9	0.0	5,646	6.3	0.0	20.4
Middle	36	22.2	21.9	6,248	15.7	17.8	54	16.4	0.0	11,482	12.7	0.0	23.4
Upper	88	54.3	42.3	27,156	68.0	52.9	204	61.8	0.0	64,783	71.8	0.0	34.9
Unknown	12	7.4	17.1	3,072	7.7	18.3	22	6.7	0.0	5,578	6.2	0.0	0.0
Total	162	100.0	100.0	39,914	100.0	100.0	330	100.0	0.0	90,285	100.0	0.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Kalispell, MT

Home Improvement Loans													
Low	2	4.3	5.6	80	2.8	5.2	2	4.4	0.0	152	3.7	0.0	21.3
Moderate	5	10.9	16.2	169	5.9	11.9	8	17.8	0.0	357	8.7	0.0	20.4
Middle	11	23.9	21.8	336	11.8	15.6	10	22.2	0.0	524	12.8	0.0	23.4
Upper	25	54.3	51.9	2,148	75.4	62.8	21	46.7	0.0	2,856	69.7	0.0	34.9
Unknown	3	6.5	4.5	115	4.0	4.5	4	8.9	0.0	210	5.1	0.0	0.0
Total	46	100.0	100.0	2,848	100.0	100.0	45	100.0	0.0	4,099	100.0	0.0	100.0
Total Home Mortgage Loans													
Low	17	4.1	3.8	1,704	1.9	1.7	25	4.1	0.0	3,872	2.5	0.0	21.3
Moderate	44	10.7	13.9	6,112	6.9	8.6	70	11.6	0.0	10,237	6.5	0.0	20.4
Middle	88	21.4	22.8	14,783	16.6	18.3	108	17.9	0.0	20,618	13.2	0.0	23.4
Upper	237	57.5	46.3	60,198	67.6	57.1	368	60.8	0.0	113,368	72.5	0.0	34.9
Unknown	26	6.3	13.3	6,233	7.0	14.3	34	5.6	0.0	8,223	5.3	0.0	0.0
Total	412	100.0	100.0	89,030	100.0	100.0	605	100.0	0.0	156,318	100.0	0.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Kalispell, MT

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	3.5	7.0	95	1.7	3.5	4	5.9	0.0	200	2.3	0.0	21.3
Moderate	6	10.5	12.9	423	7.6	8.9	5	7.4	0.0	258	3.0	0.0	20.4
Middle	9	15.8	20.7	711	12.7	16.2	15	22.1	0.0	1,742	20.5	0.0	23.4
Upper	38	66.7	57.4	4,247	76.0	70.3	42	61.8	0.0	6,230	73.2	0.0	34.9
Unknown	2	3.5	2.0	115	2.1	1.2	2	2.9	0.0	85	1.0	0.0	0.0
Total	57	100.0	100.0	5,591	100.0	100.0	68	100.0	0.0	8,515	100.0	0.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.2	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	21.3
Moderate	0	0.0	12.5	0	0.0	3.5	0	0.0	0.0	0	0.0	0.0	20.4
Middle	0	0.0	25.0	0	0.0	9.1	1	50.0	0.0	254	33.2	0.0	23.4
Upper	1	100.0	50.0	56	100.0	46.8	1	50.0	0.0	510	66.8	0.0	34.9
Unknown	0	0.0	8.3	0	0.0	40.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	56	100.0	100.0	2	100.0	0.0	764	100.0	0.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.3
Moderate	0	0.0	4.8	0	0.0	3.2	0	0.0	0.0	0	0.0	0.0	20.4

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Kalispell, MT

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.4
Upper	0	0.0	2.4	0	0.0	12.4	0	0.0	0.0	0	0.0	0.0	34.9
Unknown	0	0.0	92.9	0	0.0	84.4	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Kalispell, MT

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	23	8.2	13.7	1,487	6.2	11.9	79	10.7	0.0	5,594	10.2	0.0	15.7
Middle	231	82.8	73.5	19,741	82.7	78.0	601	81.5	0.0	44,391	80.8	0.0	75.7
Upper	25	9.0	8.7	2,653	11.1	8.2	57	7.7	0.0	4,978	9.1	0.0	8.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	4.1	0	0.0	2.0	0	0.0	0.0	0	0.0	0.0	
Total	279	100.0	100.0	23,881	100.0	100.0	737	100.0	0.0	54,963	100.0	0.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Kalispell, MT

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	165	59.1	48.4	11,273	47.2	46.2	173	23.5	0.0	14,432	26.3	0.0	93.0
Over $1 Million	84	30.1		10,942	45.8		79	10.7		11,393	20.7		6.0
Revenue Unknown	30	10.8		1,667	7.0		485	65.8		29,138	53.0		1.0

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Kalispell, MT													
Total	279	100.0		23,881	100.0		737	100.0		54,963	100.0		100.0
By Loan Size													
$100,000 or Less	219	78.5	93.8	7,877	33.0	43.0	596	80.9	0.0	18,068	32.9	0.0	
$100,001 - $250,000	37	13.3	3.4	6,121	25.6	17.1	89	12.1	0.0	14,315	26.0	0.0	
$250,001 - $1 Million	23	8.2	2.8	9,883	41.4	39.9	52	7.1	0.0	22,580	41.1	0.0	
Total	279	100.0	100.0	23,881	100.0	100.0	737	100.0	0.0	54,963	100.0	0.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	139	84.2		4,231	37.5		133	76.9		4,231	29.3		
$100,001 - $250,000	14	8.5		2,310	20.5		25	14.5		3,672	25.4		
$250,001 - $1 Million	12	7.3		4,732	42.0		15	8.7		6,529	45.2		
Total	165	100.0		11,273	100.0		173	100.0		14,432	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Kalispell, MT													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	21.0	0	0.0	18.1	2	14.3	0.0	304	27.9	0.0	18.1
Middle	14	100.0	72.9	729	100.0	79.1	11	78.6	0.0	760	69.8	0.0	74.4
Upper	0	0.0	4.7	0	0.0	2.6	1	7.1	0.0	25	2.3	0.0	7.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	729	100.0	100.0	14	100.0	0.0	1,089	100.0	0.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms

Assessment Area: Kalispell, MT													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	10	71.4	74.8	620	85.0	85.1	10	71.4	0.0	811	74.5	0.0	97.6
Over $1 Million	0	0.0		0	0.0		2	14.3		222	20.4		2.2
Revenue Unknown	4	28.6		109	15.0		2	14.3		56	5.1		0.2
Total	14	100.0		729	100.0		14	100.0		1,089	100.0		100.0
By Loan Size													
$100,000 or Less	12	85.7	87.9	354	48.6	47.0	10	71.4	0.0	319	29.3	0.0	
$100,001 - $250,000	1	7.1	9.3	115	15.8	31.4	3	21.4	0.0	470	43.2	0.0	
$250,001 - $500,000	1	7.1	2.8	260	35.7	21.6	1	7.1	0.0	300	27.5	0.0	
Total	14	100.0	100.0	729	100.0	100.0	14	100.0	0.0	1,089	100.0	0.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	8	80.0		245	39.5		7	70.0		191	23.6		
$100,001 - $250,000	1	10.0		115	18.5		2	20.0		320	39.5		
$250,001 - $500,000	1	10.0		260	41.9		1	10.0		300	37.0		
Total	10	100.0		620	100.0		10	100.0		811	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Kalispell, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	26	8.3%	346	4.7%
Moderate	71	22.5%	1,615	22.1%	67	21.3%	1,216	16.6%
Low/Moderate Total	71	22.5%	1,615	22.1%	93	29.5%	1,562	21.3%
Middle	223	70.8%	5,240	71.5%	76	24.1%	1,859	25.4%
Upper	21	6.7%	469	6.4%	143	45.4%	3,818	52.1%
Unknown	0	0.0%	0	0.0%	3	1.0%	85	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	315	100.0%	7,324	100.0%	315	100.0%	7,324	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	24	10.3%	230	5.0%
Moderate	34	14.5%	692	15.1%	33	14.1%	649	14.1%
Low/Moderate Total	34	14.5%	692	15.1%	57	24.4%	879	19.1%
Middle	184	78.6%	3,489	76.0%	47	20.1%	793	17.3%
Upper	16	6.8%	410	8.9%	128	54.7%	2,887	62.9%
Unknown	0	0.0%	0	0.0%	2	0.9%	32	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	234	100.0%	4,591	100.0%	234	100.0%	4,591	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	23	19.8%	154	12.0%
Moderate	21	18.1%	207	16.1%	37	31.9%	310	24.1%
Low/Moderate Total	21	18.1%	207	16.1%	60	51.7%	464	36.1%
Middle	86	74.1%	907	70.5%	22	19.0%	196	15.2%
Upper	9	7.8%	173	13.4%	29	25.0%	496	38.5%
Unknown	0	0.0%	0	0.0%	5	4.3%	131	10.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	1,287	100.0%	116	100.0%	1,287	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	73	11.0%	730	5.5%
Moderate	126	18.9%	2,514	19.0%	137	20.6%	2,175	16.5%
Low/Moderate Total	126	18.9%	2,514	19.0%	210	31.6%	2,905	22.0%
Middle	493	74.1%	9,636	73.0%	145	21.8%	2,848	21.6%
Upper	46	6.9%	1,052	8.0%	300	45.1%	7,201	54.5%
Unknown	0	0.0%	0	0.0%	10	1.5%	248	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	665	100.0%	13,202	100.0%	665	100.0%	13,202	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Kalispell, MT

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	27	8.4%	493	6.2%
Moderate	52	16.2%	1,272	16.1%	64	19.9%	1,265	16.0%
Low/Moderate Total	52	16.2%	1,272	16.1%	91	28.3%	1,758	22.2%
Middle	242	75.4%	5,912	74.7%	101	31.5%	2,352	29.7%
Upper	27	8.4%	731	9.2%	128	39.9%	3,800	48.0%
Unknown	0	0.0%	0	0.0%	1	0.3%	5	0.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	321	100.0%	7,915	100.0%	321	100.0%	7,915	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	13	4.5%	149	2.0%
Moderate	52	17.8%	1,028	13.5%	35	12.0%	647	8.5%
Low/Moderate Total	52	17.8%	1,028	13.5%	48	16.4%	796	10.4%
Middle	209	71.6%	5,900	77.3%	80	27.4%	1,482	19.4%
Upper	31	10.6%	703	9.2%	160	54.8%	5,336	69.9%
Unknown	0	0.0%	0	0.0%	4	1.4%	17	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	292	100.0%	7,631	100.0%	292	100.0%	7,631	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	23	24.2%	176	6.9%
Moderate	9	9.5%	89	3.5%	25	26.3%	320	12.5%
Low/Moderate Total	9	9.5%	89	3.5%	48	50.5%	496	19.4%
Middle	80	84.2%	2,402	94.1%	14	14.7%	176	6.9%
Upper	6	6.3%	61	2.4%	31	32.6%	1,852	72.6%
Unknown	0	0.0%	0	0.0%	2	2.1%	28	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	95	100.0%	2,552	100.0%	95	100.0%	2,552	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	63	8.9%	818	4.5%
Moderate	113	16.0%	2,389	13.2%	124	17.5%	2,232	12.3%
Low/Moderate Total	113	16.0%	2,389	13.2%	187	26.4%	3,050	16.9%

Middle	531	75.0%	14,214	78.5%	195	27.5%	4,010	22.2%
Upper	64	9.0%	1,495	8.3%	319	45.1%	10,988	60.7%
Unknown	0	0.0%	0	0.0%	7	1.0%	50	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	708	100.0%	18,098	100.0%	708	100.0%	18,098	100.0%

2020 Kalispell, MT 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	7,963	21.3
Moderate	6	18.8	6,401	17.1	1,080	16.9	7,625	20.4
Middle	24	75.0	27,757	74.3	2,718	9.8	8,726	23.4
Upper	2	6.3	3,180	8.5	231	7.3	13,024	34.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**32**	**100.0**	**37,338**	**100.0**	**4,029**	**10.8**	**37,338**	**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	14,905	7,123	17.2	47.8	3,633	24.4	4,149	27.8
Middle	55,728	30,811	74.4	55.3	11,920	21.4	12,997	23.3
Upper	4,761	3,498	8.4	73.5	744	15.6	519	10.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**75,394**	**41,432**	**100.0**	**55.0**	**16,297**	**21.6**	**17,665**	**23.4**

	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	1,487	15.7	1,377	15.6	92	16.3	18	19.4
Middle	7,162	75.7	6,662	75.6	430	76.0	70	75.3
Upper	818	8.6	769	8.7	44	7.8	5	5.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,467**	**100.0**	**8,808**	**100.0**	**566**	**100.0**	**93**	**100.0**
Percentage of Total Businesses:				**93.0**		**6.0**		**1.0**

	Total Farms by Tract	Farms by Tract & Revenue Size			
		Less Than or = $1 Million		Over $1 Million	Revenue Not Reported

2020 Kalispell, MT AA Demographics								
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	106	18.1	104	18.2	2	15.4	0	0.0
Middle	436	74.4	428	74.8	7	53.8	1	100.0
Upper	44	7.5	40	7.0	4	30.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**586**	**100.0**	**572**	**100.0**	**13**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.6**		**2.2**		**0.2**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Kennewick-Richland, WA MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	1.9	0	0.0	1.1	1.7
Moderate	1	33.3	20.0	184	10.5	14.4	0	0.0	20.6	0	0.0	14.8	20.1
Middle	1	33.3	22.8	255	14.6	19.9	0	0.0	21.1	0	0.0	17.9	28.8
Upper	1	33.3	55.6	1,308	74.9	64.7	2	100.0	56.3	490	100.0	66.1	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,747	100.0	100.0	2	100.0	100.0	490	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	1.2	0	0.0	1.0	0	0.0	0.6	1.7
Moderate	0	0.0	17.8	0	0.0	13.1	1	9.1	13.1	337	10.2	9.7	20.1
Middle	0	0.0	21.1	0	0.0	18.4	1	9.1	18.3	240	7.2	15.8	28.8
Upper	1	100.0	59.3	303	100.0	67.3	9	81.8	67.6	2,740	82.6	73.8	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	303	100.0	100.0	11	100.0	100.0	3,317	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.7	0	0.0	1.4	0	0.0	1.2	0	0.0	0.9	1.7
Moderate	0	0.0	14.1	0	0.0	12.4	0	0.0	14.5	0	0.0	12.7	20.1
Middle	0	0.0	20.6	0	0.0	19.5	0	0.0	21.6	0	0.0	18.1	28.8
Upper	0	0.0	63.7	0	0.0	66.7	1	100.0	62.8	35	100.0	68.3	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Kennewick-Richland, WA MSA

Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	35	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	13.6	0	0.0	2.4	10.5
Moderate	0	0.0	28.0	0	0.0	32.3	0	0.0	31.8	0	0.0	10.0	24.0
Middle	0	0.0	40.0	0	0.0	36.5	0	0.0	27.3	0	0.0	29.4	40.3
Upper	0	0.0	32.0	0	0.0	31.1	0	0.0	27.3	0	0.0	58.1	25.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	1.7	0	0.0	1.1	1	6.7	1.4	100	2.5	0.9	1.7
Moderate	1	25.0	18.7	184	9.0	14.6	1	6.7	16.3	337	8.5	11.9	20.1
Middle	1	25.0	22.0	255	12.4	19.9	1	6.7	19.7	240	6.1	17.3	28.8
Upper	2	50.0	57.7	1,611	78.6	64.4	12	80.0	62.6	3,265	82.8	70.0	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,050	100.0	100.0	15	100.0	100.0	3,942	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Kennewick-Richland, WA MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.7	0	0.0	0.4	1	100.0	0.9	100	100.0	0.8	1.7
Moderate	0	0.0	16.2	0	0.0	13.4	0	0.0	14.6	0	0.0	9.5	20.1
Middle	0	0.0	21.9	0	0.0	19.0	0	0.0	18.8	0	0.0	12.9	28.8
Upper	0	0.0	61.2	0	0.0	67.2	0	0.0	65.7	0	0.0	76.8	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.5	0	0.0	1.2	0	0.0	0.7	0	0.0	0.1	1.7
Moderate	0	0.0	18.4	0	0.0	15.3	0	0.0	18.0	0	0.0	20.8	20.1
Middle	0	0.0	19.1	0	0.0	15.9	0	0.0	20.7	0	0.0	15.1	28.8
Upper	0	0.0	61.0	0	0.0	67.6	0	0.0	60.7	0	0.0	63.9	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Kennewick-Richland, WA MSA

Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.1	0	0.0	2.8	0	0.0	2.7	0	0.0	1.6	1.7
Moderate	0	0.0	26.6	0	0.0	19.3	0	0.0	35.7	0	0.0	27.0	20.1
Middle	0	0.0	30.4	0	0.0	31.0	0	0.0	30.8	0	0.0	28.5	28.8
Upper	0	0.0	38.0	0	0.0	46.8	0	0.0	30.8	0	0.0	42.9	49.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Kennewick-Richland, WA MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.7	0	0.0	2.6	0	0.0	3.2	0	0.0	2.0	20.3
Moderate	0	0.0	19.1	0	0.0	14.1	0	0.0	17.7	0	0.0	13.5	16.9
Middle	0	0.0	25.1	0	0.0	23.6	0	0.0	27.5	0	0.0	26.0	18.2
Upper	3	100.0	38.4	1,747	100.0	48.2	2	100.0	43.9	490	100.0	51.6	44.6
Unknown	0	0.0	12.7	0	0.0	11.4	0	0.0	7.7	0	0.0	6.9	0.0
Total	3	100.0	100.0	1,747	100.0	100.0	2	100.0	100.0	490	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.1	0	0.0	3.7	0	0.0	3.5	0	0.0	1.9	20.3
Moderate	0	0.0	15.4	0	0.0	11.6	2	18.2	10.7	461	13.9	7.7	16.9
Middle	0	0.0	22.3	0	0.0	19.7	1	9.1	21.4	150	4.5	18.8	18.2
Upper	1	100.0	39.6	303	100.0	46.1	7	63.6	46.8	2,466	74.3	52.5	44.6
Unknown	0	0.0	16.6	0	0.0	19.0	1	9.1	17.6	240	7.2	19.0	0.0
Total	1	100.0	100.0	303	100.0	100.0	11	100.0	100.0	3,317	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.1	0	0.0	4.6	0	0.0	3.2	0	0.0	2.1	20.3
Moderate	0	0.0	12.2	0	0.0	10.1	0	0.0	10.3	0	0.0	8.4	16.9
Middle	0	0.0	23.8	0	0.0	22.7	1	100.0	24.0	35	100.0	20.8	18.2
Upper	0	0.0	57.8	0	0.0	61.0	0	0.0	61.4	0	0.0	67.7	44.6
Unknown	0	0.0	1.1	0	0.0	1.6	0	0.0	1.2	0	0.0	1.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	35	100.0	100.0	100.0
Total Home Mortgage Loans													

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Kennewick-Richland, WA MSA

Low	0	0.0	5.3	0	0.0	3.1	0	0.0	3.4	0	0.0	1.9	20.3
Moderate	0	0.0	16.7	0	0.0	12.8	2	13.3	13.2	461	11.7	10.0	16.9
Middle	0	0.0	23.6	0	0.0	21.8	2	13.3	23.4	185	4.7	21.5	18.2
Upper	4	100.0	40.9	2,050	100.0	47.8	10	66.7	46.0	3,056	77.5	52.2	44.6
Unknown	0	0.0	13.5	0	0.0	14.4	1	6.7	14.0	240	6.1	14.3	0.0
Total	4	100.0	100.0	2,050	100.0	100.0	15	100.0	100.0	3,942	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Kennewick-Richland, WA MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.2	0	0.0	2.5	0	0.0	3.3	0	0.0	2.5	20.3
Moderate	0	0.0	11.9	0	0.0	9.3	0	0.0	12.7	0	0.0	8.3	16.9
Middle	0	0.0	25.2	0	0.0	18.5	0	0.0	16.4	0	0.0	12.1	18.2
Upper	0	0.0	59.0	0	0.0	69.0	1	100.0	67.1	100	100.0	76.8	44.6
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.5	0	0.0	0.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.7	0	0.0	5.2	0	0.0	8.0	0	0.0	4.4	20.3
Moderate	0	0.0	15.4	0	0.0	13.0	0	0.0	14.0	0	0.0	13.9	16.9
Middle	0	0.0	21.0	0	0.0	17.3	0	0.0	22.7	0	0.0	18.0	18.2
Upper	0	0.0	53.6	0	0.0	58.8	0	0.0	50.0	0	0.0	60.5	44.6
Unknown	0	0.0	3.4	0	0.0	5.7	0	0.0	5.3	0	0.0	3.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.3
Moderate	0	0.0	1.3	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	16.9
Middle	0	0.0	3.8	0	0.0	6.4	0	0.0	0.0	0	0.0	0.0	18.2
Upper	0	0.0	6.3	0	0.0	16.3	0	0.0	0.5	0	0.0	0.0	44.6
Unknown	0	0.0	88.6	0	0.0	75.8	0	0.0	99.5	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Kennewick-Richland, WA MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.4	0	0.0	1.8	0	0.0	1.9	0	0.0	1.1	1.5
Moderate	1	6.7	21.5	1,000	18.6	21.5	6	12.2	21.0	681	12.0	20.3	22.9
Middle	6	40.0	32.0	1,148	21.3	34.7	25	51.0	35.1	2,655	46.8	40.1	34.3
Upper	8	53.3	43.6	3,242	60.1	41.3	18	36.7	41.6	2,336	41.2	38.2	41.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	0.7	0	0.0	0.4	0	0.0	0.3	
Total	15	100.0	100.0	5,390	100.0	100.0	49	100.0	100.0	5,672	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Kennewick-Richland, WA MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	5	33.3	48.3	2,846	52.8	38.0	4	8.2	37.1	93	1.6	23.7	93.6
Over $1 Million	9	60.0		2,522	46.8		3	6.1		830	14.6		5.6
Revenue Unknown	1	6.7		22	0.4		42	85.7		4,749	83.7		0.8
Total	15	100.0		5,390	100.0		49	100.0		5,672	100.0		100.0
By Loan Size													
$100,000 or Less	6	40.0	93.3	226	4.2	33.8	28	57.1	87.9	1,109	19.6	34.3	
$100,001 - $250,000	1	6.7	2.9	125	2.3	12.4	12	24.5	6.6	1,611	28.4	19.2	
$250,001 - $1 Million	8	53.3	3.9	5,039	93.5	53.8	9	18.4	5.5	2,952	52.0	46.4	
Total	15	100.0	100.0	5,390	100.0	100.0	49	100.0	100.0	5,672	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	20.0		50	1.8		4	100.0		93	100.0		

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Kennewick-Richland, WA MSA													
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	4	80.0		2,796	98.2		0	0.0		0	0.0		
Total	5	100.0		2,846	100.0		4	100.0		93	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Kennewick-Richland, WA MSA													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.0
Moderate	0	0.0	5.4	0	0.0	1.9	0	0.0	6.5	0	0.0	7.3	7.2
Middle	0	0.0	57.4	0	0.0	58.1	3	100.0	59.4	645	100.0	66.2	55.9
Upper	1	100.0	33.1	200	100.0	39.4	0	0.0	34.2	0	0.0	26.5	35.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	4.1	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	200	100.0	100.0	3	100.0	100.0	645	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Kennewick-Richland, WA MSA													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	1	100.0	41.9	200	100.0	40.1	3	100.0	38.1	645	100.0	33.6	93.8
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.9

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Kennewick-Richland, WA MSA													
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.3
Total	1	100.0		200	100.0		3	100.0		645	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	85.1	0	0.0	29.2	1	33.3	73.5	90	14.0	22.6	
$100,001 - $250,000	1	100.0	9.5	200	100.0	31.6	0	0.0	12.3	0	0.0	22.7	
$250,001 - $500,000	0	0.0	5.4	0	0.0	39.1	2	66.7	14.2	555	86.0	54.8	
Total	1	100.0	100.0	200	100.0	100.0	3	100.0	100.0	645	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	33.3		90	14.0		
$100,001 - $250,000	1	100.0		200	100.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		2	66.7		555	86.0		
Total	1	100.0		200	100.0		3	100.0		645	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Kennewick-Richland, WA MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	10	22.7%
Low/Moderate Total	0	0.0%	0	0.0%	1	33.3%	10	22.7%
Middle	1	33.3%	19	43.2%	2	66.7%	34	77.3%
Upper	2	66.7%	25	56.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	44	100.0%	3	100.0%	44	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	50.0%	21	17.5%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	21	17.5%
Middle	3	75.0%	29	24.2%	0	0.0%	0	0.0%
Upper	1	25.0%	91	75.8%	2	50.0%	99	82.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	120	100.0%	4	100.0%	120	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	3	42.9%	31	18.9%
Low/Moderate Total	0	0.0%	0	0.0%	3	42.9%	31	18.9%
Middle	4	57.1%	48	29.3%	2	28.6%	34	20.7%
Upper	3	42.9%	116	70.7%	2	28.6%	99	60.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	164	100.0%	7	100.0%	164	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Kennewick-Richland, WA MSA

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							

Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	66.7%	30	63.8%	0	0.0%	0	0.0%
Low/Moderate Total	2	66.7%	30	63.8%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	33.3%	17	36.2%	3	100.0%	47	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	47	100.0%	3	100.0%	47	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	12.5%	28	9.0%
Moderate	1	12.5%	19	6.1%	0	0.0%	0	0.0%
Low/Moderate Total	1	12.5%	19	6.1%	1	12.5%	28	9.0%
Middle	1	12.5%	9	2.9%	2	25.0%	25	8.0%
Upper	6	75.0%	284	91.0%	5	62.5%	259	83.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	312	100.0%	8	100.0%	312	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	17	22.1%
Low/Moderate Total	0	0.0%	0	0.0%	1	33.3%	17	22.1%
Middle	3	100.0%	77	100.0%	1	33.3%	10	13.0%
Upper	0	0.0%	0	0.0%	1	33.3%	50	64.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	77	100.0%	3	100.0%	77	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	7.1%	28	6.4%
Moderate	3	21.4%	49	11.2%	1	7.1%	17	3.9%
Low/Moderate Total	3	21.4%	49	11.2%	2	14.3%	45	10.3%
Middle	4	28.6%	86	19.7%	3	21.4%	35	8.0%
Upper	7	50.0%	301	69.0%	9	64.3%	356	81.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	436	100.0%	14	100.0%	436	100.0%

2020 Kennewick-Richland, WA MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	1	2.7	1,772	3.8	779	44.0	9,499	20.3
Moderate	9	24.3	9,850	21.1	1,533	15.6	7,897	16.9
Middle	11	29.7	13,961	29.9	1,820	13.0	8,491	18.2
Upper	15	40.5	21,149	45.2	844	4.0	20,853	44.6

2020 Kennewick-Richland, WA MSA AA Demographics								
Unknown	1	2.7	8	0.0	0	0.0	0	0.0
Total AA	**37**	**100.0**	**46,740**	**100.0**	**4,976**	**10.6**	**46,740**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,906	776	1.7	26.7	2,092	72.0	38	1.3
Moderate	16,805	9,125	20.1	54.3	6,595	39.2	1,085	6.5
Middle	22,441	13,091	28.8	58.3	7,806	34.8	1,544	6.9
Upper	29,313	22,516	49.5	76.8	5,421	18.5	1,376	4.7
Unknown	8	0	0.0	0.0	8	100.0	0	0.0
Total AA	**71,473**	**45,508**	**100.0**	**63.7**	**21,922**	**30.7**	**4,043**	**5.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	126	1.5	119	1.6	5	1.1	2	3.2
Moderate	1,880	22.9	1,749	22.8	117	25.3	14	22.2
Middle	2,815	34.3	2,592	33.8	201	43.5	22	34.9
Upper	3,375	41.2	3,211	41.8	139	30.1	25	39.7
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	**8,198**	**100.0**	**7,673**	**100.0**	**462**	**100.0**	**63**	**100.0**
Percentage of Total Businesses:				**93.6**		**5.6**		**0.8**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	1.0	3	1.0	0	0.0	0	0.0
Moderate	22	7.2	21	7.3	1	5.6	0	0.0
Middle	171	55.9	156	54.4	15	83.3	0	0.0
Upper	110	35.9	107	37.3	2	11.1	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**306**	**100.0**	**287**	**100.0**	**18**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**93.8**		**5.9**		**0.3**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Ketchum, ID

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	14.0	0	0.0	9.8	0	0.0	11.4	0	0.0	7.9	21.3
Upper	2	100.0	86.0	1,043	100.0	90.2	0	0.0	88.6	0	0.0	92.1	78.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,043	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	21.3	0	0.0	15.9	0	0.0	19.9	0	0.0	14.6	21.3
Upper	0	0.0	78.7	0	0.0	84.1	4	100.0	80.0	2,892	100.0	85.3	78.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	2,892	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	18.9	0	0.0	9.2	0	0.0	16.7	0	0.0	15.5	21.3
Upper	1	100.0	79.2	750	100.0	88.1	3	100.0	83.3	1,025	100.0	84.5	78.7
Unknown	0	0.0	1.9	0	0.0	2.7	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	750	100.0	100.0	3	100.0	100.0	1,025	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	50.0	0	0.0	51.2	0.0
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	50.0	0	0.0	48.8	100.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	25.0	17.5	17	0.9	11.6	0	0.0	17.2	0	0.0	11.6	21.3
Upper	3	75.0	82.4	1,793	99.1	88.3	10	100.0	82.8	4,235	100.0	88.3	78.7

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Ketchum, ID

Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	1,810	100.0	100.0	10	100.0	100.0	4,235	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Ketchum, ID

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	20.9	17	100.0	7.3	0	0.0	22.7	0	0.0	10.2	21.3
Upper	0	0.0	79.1	0	0.0	92.7	3	100.0	77.3	318	100.0	89.8	78.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	17	100.0	100.0	3	100.0	100.0	318	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	15.9	0	0.0	7.2	0	0.0	2.6	0	0.0	0.1	21.3
Upper	0	0.0	84.1	0	0.0	92.8	0	0.0	97.4	0	0.0	99.9	78.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	4.2	0	0.0	3.6	0	0.0	0.0	0	0.0	0.0	21.3
Upper	0	0.0	95.8	0	0.0	96.4	0	0.0	100.0	0	0.0	100.0	78.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Ketchum, ID

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	0.4	0	0.0	0.4	13.8
Moderate	0	0.0	3.0	0	0.0	1.5	0	0.0	4.3	0	0.0	1.2	12.5
Middle	0	0.0	16.2	0	0.0	7.6	0	0.0	13.4	0	0.0	6.3	14.1
Upper	2	100.0	72.4	1,043	100.0	79.3	0	0.0	76.8	0	0.0	82.4	59.6
Unknown	0	0.0	6.9	0	0.0	10.7	0	0.0	5.2	0	0.0	9.7	0.0
Total	2	100.0	100.0	1,043	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.3	0	0.0	0.6	0	0.0	0.5	0	0.0	0.2	13.8
Moderate	0	0.0	4.1	0	0.0	1.6	0	0.0	5.1	0	0.0	3.0	12.5
Middle	0	0.0	12.4	0	0.0	7.1	0	0.0	16.3	0	0.0	9.4	14.1
Upper	0	0.0	73.5	0	0.0	77.9	4	100.0	69.1	2,892	100.0	77.3	59.6
Unknown	0	0.0	8.7	0	0.0	12.9	0	0.0	9.0	0	0.0	10.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	2,892	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.9	0	0.0	0.7	0	0.0	1.9	0	0.0	0.2	13.8
Moderate	0	0.0	1.9	0	0.0	0.3	0	0.0	3.7	0	0.0	3.0	12.5
Middle	0	0.0	17.0	0	0.0	11.0	1	33.3	14.8	125	12.2	13.4	14.1
Upper	1	100.0	77.4	750	100.0	81.3	2	66.7	74.1	900	87.8	81.4	59.6
Unknown	0	0.0	1.9	0	0.0	6.8	0	0.0	5.6	0	0.0	2.0	0.0
Total	1	100.0	100.0	750	100.0	100.0	3	100.0	100.0	1,025	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.3	0	0.0	0.7	0	0.0	0.6	0	0.0	0.2	13.8
Moderate	1	25.0	3.9	17	0.9	1.5	0	0.0	4.7	0	0.0	2.1	12.5
Middle	0	0.0	13.7	0	0.0	7.0	1	10.0	14.7	125	3.0	7.6	14.1
Upper	3	75.0	71.7	1,793	99.1	76.1	9	90.0	71.9	4,110	97.0	78.8	59.6
Unknown	0	0.0	9.4	0	0.0	14.6	0	0.0	8.1	0	0.0	11.2	0.0
Total	4	100.0	100.0	1,810	100.0	100.0	10	100.0	100.0	4,235	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Ketchum, ID

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	1.5	0	0.0	0.1	0	0.0	2.1	0	0.0	0.2	13.8
Moderate	1	100.0	11.9	17	100.0	2.6	0	0.0	5.2	0	0.0	2.4	12.5
Middle	0	0.0	9.0	0	0.0	6.4	0	0.0	10.3	0	0.0	4.2	14.1
Upper	0	0.0	70.1	0	0.0	46.5	3	100.0	79.4	318	100.0	89.3	59.6
Unknown	0	0.0	7.5	0	0.0	44.3	0	0.0	3.1	0	0.0	4.0	0.0
Total	1	100.0	100.0	17	100.0	100.0	3	100.0	100.0	318	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	13.8
Moderate	0	0.0	4.5	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	12.5
Middle	0	0.0	9.1	0	0.0	1.8	0	0.0	0.0	0	0.0	0.0	14.1
Upper	0	0.0	75.0	0	0.0	72.9	0	0.0	81.6	0	0.0	71.5	59.6
Unknown	0	0.0	11.4	0	0.0	23.9	0	0.0	18.4	0	0.0	28.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	13.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	12.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	59.6
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Ketchum, ID

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	50.0	21.3	250	90.9	23.4	7	18.9	21.7	135	5.1	23.3	26.9
Upper	1	50.0	66.7	25	9.1	67.3	30	81.1	73.2	2,505	94.9	71.9	73.1

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Ketchum, ID													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.0	0	0.0	9.3	0	0.0	5.1	0	0.0	4.8	
Total	2	100.0	100.0	275	100.0	100.0	37	100.0	100.0	2,640	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Ketchum, ID													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	100.0	54.7	275	100.0	44.7	4	10.8	51.9	298	11.3	31.3	87.9
Over $1 Million	0	0.0		0	0.0		3	8.1		182	6.9		10.9
Revenue Unknown	0	0.0		0	0.0		30	81.1		2,160	81.8		1.1
Total	2	100.0		275	100.0		37	100.0		2,640	100.0		100.0
By Loan Size													
$100,000 or Less	1	50.0	93.1	25	9.1	40.5	31	83.8	89.6	829	31.4	45.1	
$100,001 - $250,000	1	50.0	3.6	250	90.9	14.8	4	10.8	7.3	715	27.1	23.2	
$250,001 - $1 Million	0	0.0	3.3	0	0.0	44.7	2	5.4	3.1	1,096	41.5	31.7	
Total	2	100.0	100.0	275	100.0	100.0	37	100.0	100.0	2,640	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	50.0		25	9.1		3	75.0		130	43.6		
$100,001 - $250,000	1	50.0		250	90.9		1	25.0		168	56.4		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	2	100.0		275	100.0		4	100.0		298	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Ketchum, ID

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	73.6	0	0.0	91.7	0	0.0	65.7	0	0.0	74.0	66.7
Upper	0	0.0	18.9	0	0.0	1.4	0	0.0	25.7	0	0.0	15.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	7.5	0	0.0	7.0	0	0.0	8.6	0	0.0	10.7	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Ketchum, ID

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	60.4	0	0.0	63.1	0	0.0	71.4	0	0.0	75.1	100.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	79.2	0	0.0	25.6	0	0.0	80.0	0	0.0	35.3	
$100,001 - $250,000	0	0.0	9.4	0	0.0	18.9	0	0.0	11.4	0	0.0	22.6	
$250,001 - $500,000	0	0.0	11.3	0	0.0	55.6	0	0.0	8.6	0	0.0	42.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 -	0	0.0		0	0.0		0	0.0		0	0.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Ketchum, ID													
$250,000													
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Ketchum, ID

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	100.0%	38	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	100.0%	38	100.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	100.0%	38	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	38	100.0%	2	100.0%	38	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	100.0%	83	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	3	100.0%	83	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	83	100.0%	3	100.0%	83	100.0%
	Other - Unsecured							

Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	40.0%	38	31.4%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	38	31.4%
Middle	3	60.0%	83	68.6%	0	0.0%	0	0.0%
Upper	2	40.0%	38	31.4%	3	60.0%	83	68.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	121	100.0%	5	100.0%	121	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Ketchum, ID

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	20.0%	29	25.4%
Upper	5	100.0%	114	100.0%	4	80.0%	85	74.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	114	100.0%	5	100.0%	114	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	100.0%	195	100.0%	2	100.0%	195	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	195	100.0%	2	100.0%	195	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	14.3%	29	9.4%
Upper	7	100.0%	309	100.0%	6	85.7%	280	90.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	309	100.0%	7	100.0%	309	100.0%

2020 Ketchum, ID 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	787	13.8
Moderate	0	0.0	0	0.0	0	0.0	718	12.5
Middle	1	25.0	1,370	23.9	110	8.0	806	14.1
Upper	3	75.0	4,353	76.1	359	8.2	3,412	59.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**5,723**	**100.0**	**469**	**8.2**	**5,723**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,375	1,255	21.3	52.8	570	24.0	550	23.2
Upper	12,734	4,629	78.7	36.4	2,470	19.4	5,635	44.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0

2020 Ketchum, ID AA Demographics								
Total AA	**15,109**	**5,884**	**100.0**	**38.9**	**3,040**	**20.1**	**6,185**	**40.9**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	404	26.9	359	27.2	39	23.8	6	35.3
Upper	1,097	73.1	961	72.8	125	76.2	11	64.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,501**	**100.0**	**1,320**	**100.0**	**164**	**100.0**	**17**	**100.0**
Percentage of Total Businesses:				**87.9**		**10.9**		**1.1**

	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	24	66.7	24	66.7	0	0.0	0	0.0
Upper	12	33.3	12	33.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**36**	**100.0**	**36**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Klamath Falls-Roseburg, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.9	0	0.0	0.5	0.8
Moderate	1	10.0	10.8	133	7.5	8.7	0	0.0	10.1	0	0.0	8.5	10.3
Middle	9	90.0	76.4	1,648	92.5	78.0	4	100.0	76.4	1,168	100.0	77.6	78.5
Upper	0	0.0	12.0	0	0.0	13.0	0	0.0	12.6	0	0.0	13.4	10.4

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Klamath Falls-Roseburg, OR													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,781	100.0	100.0	4	100.0	100.0	1,168	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.2	0.8
Moderate	1	8.3	8.7	108	5.3	7.1	3	10.7	7.6	553	10.6	6.1	10.3
Middle	11	91.7	79.4	1,920	94.7	80.8	25	89.3	78.4	4,644	89.4	79.2	78.5
Upper	0	0.0	11.6	0	0.0	11.9	0	0.0	13.4	0	0.0	14.5	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	2,028	100.0	100.0	28	100.0	100.0	5,197	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.3	0.8
Moderate	3	21.4	8.6	134	14.4	7.1	3	25.0	10.3	430	48.8	7.3	10.3
Middle	9	64.3	82.1	617	66.3	84.0	9	75.0	79.7	451	51.2	82.6	78.5
Upper	2	14.3	9.3	180	19.3	8.9	0	0.0	9.3	0	0.0	9.8	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	931	100.0	100.0	12	100.0	100.0	881	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	7.1	0	0.0	13.6	0	0.0	6.1	0	0.0	8.4	4.1
Moderate	0	0.0	14.3	0	0.0	15.0	1	50.0	24.2	380	78.7	13.7	13.4
Middle	0	0.0	60.7	0	0.0	47.3	1	50.0	63.6	103	21.3	77.1	66.7
Upper	0	0.0	17.9	0	0.0	24.1	0	0.0	6.1	0	0.0	0.8	15.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	483	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.6	0	0.0	0.6	0	0.0	0.7	0	0.0	0.5	0.8
Moderate	5	12.8	9.8	375	7.5	8.1	8	15.7	8.7	1,413	17.7	7.3	10.3
Middle	32	82.1	77.9	4,412	88.8	78.7	43	84.3	77.6	6,588	82.3	78.5	78.5
Upper	2	5.1	11.7	180	3.6	12.7	0	0.0	13.0	0	0.0	13.7	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	4,967	100.0	100.0	51	100.0	100.0	8,001	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Klamath Falls-Roseburg, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.4	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.8
Moderate	0	0.0	7.7	0	0.0	5.0	1	20.0	9.9	50	18.4	7.7	10.3
Middle	3	100.0	83.2	227	100.0	84.2	4	80.0	80.1	222	81.6	82.6	78.5
Upper	0	0.0	8.8	0	0.0	10.3	0	0.0	9.9	0	0.0	9.7	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	227	100.0	100.0	5	100.0	100.0	272	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.7	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	0.8
Moderate	0	0.0	7.3	0	0.0	4.5	0	0.0	9.8	0	0.0	9.7	10.3
Middle	0	0.0	71.5	0	0.0	73.3	0	0.0	75.6	0	0.0	75.8	78.5
Upper	0	0.0	20.4	0	0.0	21.5	0	0.0	14.6	0	0.0	14.5	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.0	0	0.0	1.3	0.8
Moderate	0	0.0	12.8	0	0.0	9.6	0	0.0	9.8	0	0.0	7.7	10.3
Middle	0	0.0	78.2	0	0.0	81.9	0	0.0	74.5	0	0.0	74.7	78.5
Upper	0	0.0	9.0	0	0.0	8.5	0	0.0	13.7	0	0.0	16.3	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Klamath Falls-Roseburg, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	10.0	3.8	130	7.3	2.0	0	0.0	4.4	0	0.0	2.4	21.9
Moderate	1	10.0	15.8	227	12.7	11.2	1	25.0	18.6	228	19.5	14.1	19.3
Middle	4	40.0	26.3	727	40.8	24.1	0	0.0	26.0	0	0.0	24.5	20.3

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Klamath Falls-Roseburg, OR													
Upper	3	30.0	42.5	515	28.9	51.9	3	75.0	40.9	940	80.5	49.7	38.5
Unknown	1	10.0	11.6	182	10.2	10.8	0	0.0	10.1	0	0.0	9.3	0.0
Total	10	100.0	100.0	1,781	100.0	100.0	4	100.0	100.0	1,168	100.0	100.0	100.0
Refinance Loans													
Low	1	8.3	5.6	106	5.2	3.8	4	14.3	3.6	338	6.5	1.9	21.9
Moderate	3	25.0	12.4	339	16.7	8.6	5	17.9	11.0	723	13.9	7.6	19.3
Middle	3	25.0	18.7	412	20.3	16.0	4	14.3	16.1	715	13.8	13.9	20.3
Upper	4	33.3	36.7	965	47.6	41.8	12	42.9	36.5	2,992	57.6	41.4	38.5
Unknown	1	8.3	26.6	206	10.2	29.9	3	10.7	32.8	429	8.3	35.3	0.0
Total	12	100.0	100.0	2,028	100.0	100.0	28	100.0	100.0	5,197	100.0	100.0	100.0
Home Improvement Loans													
Low	2	14.3	4.0	60	6.4	3.0	2	16.7	8.7	66	7.5	4.4	21.9
Moderate	2	14.3	14.8	100	10.7	13.0	6	50.0	16.7	245	27.8	16.6	19.3
Middle	7	50.0	21.5	501	53.8	18.2	2	16.7	22.5	300	34.1	20.5	20.3
Upper	2	14.3	52.9	120	12.9	61.5	1	8.3	46.9	120	13.6	53.3	38.5
Unknown	1	7.1	6.9	150	16.1	4.3	1	8.3	5.1	150	17.0	5.2	0.0
Total	14	100.0	100.0	931	100.0	100.0	12	100.0	100.0	881	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	15.4	4.5	366	7.4	2.7	6	12.2	4.0	404	5.4	2.1	21.9
Moderate	6	15.4	14.2	666	13.4	10.1	12	24.5	14.1	1,196	15.9	10.3	19.3
Middle	14	35.9	23.1	1,640	33.0	20.7	7	14.3	20.0	1,035	13.8	18.2	20.3
Upper	10	25.6	40.9	1,757	35.4	47.8	20	40.8	38.2	4,304	57.2	44.7	38.5
Unknown	3	7.7	17.2	538	10.8	18.6	4	8.2	23.7	579	7.7	24.7	0.0
Total	39	100.0	100.0	4,967	100.0	100.0	49	100.0	100.0	7,518	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Klamath Falls-Roseburg, OR													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	2	66.7	6.2	70	30.8	2.9	0	0.0	4.1	0	0.0	3.1	21.9
Moderate	0	0.0	13.9	0	0.0	13.5	0	0.0	21.1	0	0.0	16.0	19.3
Middle	0	0.0	25.9	0	0.0	23.6	1	20.0	19.9	20	7.4	16.3	20.3
Upper	1	33.3	51.1	157	69.2	57.6	4	80.0	51.5	252	92.6	58.9	38.5
Unknown	0	0.0	2.9	0	0.0	2.4	0	0.0	3.5	0	0.0	5.8	0.0
Total	3	100.0	100.0	227	100.0	100.0	5	100.0	100.0	272	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Klamath Falls-Roseburg, OR

Other Purpose Closed/Exempt													
Low	0	0.0	3.6	0	0.0	2.5	0	0.0	7.3	0	0.0	2.7	21.9
Moderate	0	0.0	13.1	0	0.0	9.9	0	0.0	14.6	0	0.0	9.7	19.3
Middle	0	0.0	34.3	0	0.0	32.3	0	0.0	30.5	0	0.0	29.7	20.3
Upper	0	0.0	43.8	0	0.0	48.1	0	0.0	45.1	0	0.0	56.0	38.5
Unknown	0	0.0	5.1	0	0.0	7.2	0	0.0	2.4	0	0.0	1.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Moderate	0	0.0	1.3	0	0.0	1.1	0	0.0	0.0	0	0.0	0.0	19.3
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	3.8	0	0.0	7.7	0	0.0	0.0	0	0.0	0.0	38.5
Unknown	0	0.0	94.9	0	0.0	91.2	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Klamath Falls-Roseburg, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	1	4.5	1.4	25	2.7	0.5	7	4.0	1.3	302	2.7	1.0	1.5
Moderate	9	40.9	13.8	342	36.7	18.5	40	23.0	14.5	3,094	27.6	15.9	13.8
Middle	10	45.5	69.6	546	58.5	69.0	94	54.0	72.2	4,669	41.7	72.0	72.7
Upper	2	9.1	10.6	20	2.1	8.9	33	19.0	10.2	3,126	27.9	9.7	12.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	4.7	0	0.0	3.1	0	0.0	1.8	0	0.0	1.4	
Total	22	100.0	100.0	933	100.0	100.0	174	100.0	100.0	11,191	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Klamath Falls-Roseburg, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	15	68.2	51.2	205	22.0	37.7	28	16.1	40.9	2,304	20.6	27.1	93.2
Over $1 Million	6	27.3		658	70.5		5	2.9		722	6.5		5.7
Revenue Unknown	1	4.5		70	7.5		141	81.0		8,165	73.0		1.1
Total	22	100.0		933	100.0		174	100.0		11,191	100.0		100.0
By Loan Size													
$100,000 or Less	19	86.4	94.1	325	34.8	39.1	149	85.6	87.2	4,260	38.1	33.1	
$100,001 - $250,000	3	13.6	2.9	608	65.2	13.8	16	9.2	7.5	2,447	21.9	20.5	
$250,001 - $1 Million	0	0.0	3.1	0	0.0	47.1	9	5.2	5.3	4,484	40.1	46.4	
Total	22	100.0	100.0	933	100.0	100.0	174	100.0	100.0	11,191	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	15	100.0		205	100.0		23	82.1		674	29.3		
$100,001 - $250,000	0	0.0		0	0.0		1	3.6		245	10.6		
$250,001 - $1 Million	0	0.0		0	0.0		4	14.3		1,385	60.1		
Total	15	100.0		205	100.0		28	100.0		2,304	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Klamath Falls-Roseburg, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	4.7	0	0.0	0.8	0	0.0	4.2	0	0.0	2.1	6.3
Middle	2	100.0	84.2	40	100.0	92.3	0	0.0	84.6	0	0.0	92.8	85.1
Upper	0	0.0	6.0	0	0.0	5.0	0	0.0	10.4	0	0.0	4.6	8.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Klamath Falls-Roseburg, OR													
Tract-Unk	0	0.0	5.1	0	0.0	1.8	0	0.0	0.8	0	0.0	0.4	
Total	2	100.0	100.0	40	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Klamath Falls-Roseburg, OR													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	2	100.0	56.0	40	100.0	56.9	0	0.0	41.7	0	0.0	42.8	94.3
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.7
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	2	100.0		40	100.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	2	100.0	88.0	40	100.0	31.7	0	0.0	77.9	0	0.0	24.9	
$100,001 - $250,000	0	0.0	4.3	0	0.0	14.2	0	0.0	14.2	0	0.0	35.0	
$250,001 - $500,000	0	0.0	7.7	0	0.0	54.1	0	0.0	7.9	0	0.0	40.1	
Total	2	100.0	100.0	40	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	100.0		40	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	2	100.0		40	100.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Klamath Falls-Roseburg, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	3.2%	27	4.5%
Moderate	2	6.5%	36	6.0%	3	9.7%	60	9.9%
Low/Moderate Total	2	6.5%	36	6.0%	4	12.9%	87	14.4%
Middle	27	87.1%	528	87.3%	7	22.6%	128	21.2%
Upper	2	6.5%	41	6.8%	19	61.3%	380	62.8%
Unknown	0	0.0%	0	0.0%	1	3.2%	10	1.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	31	100.0%	605	100.0%	31	100.0%	605	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	4.8%	4	0.6%
Moderate	4	19.0%	151	21.1%	4	19.0%	88	12.3%
Low/Moderate Total	4	19.0%	151	21.1%	5	23.8%	92	12.8%
Middle	15	71.4%	375	52.4%	6	28.6%	168	23.5%
Upper	2	9.5%	190	26.5%	10	47.6%	456	63.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	716	100.0%	21	100.0%	716	100.0%
	Other - Unsecured							
Low	2	2.6%	27	3.2%	17	22.1%	123	14.5%
Moderate	9	11.7%	56	6.6%	26	33.8%	233	27.4%
Low/Moderate Total	11	14.3%	83	9.8%	43	55.8%	356	41.9%
Middle	61	79.2%	672	79.1%	18	23.4%	251	29.5%
Upper	5	6.5%	95	11.2%	13	16.9%	225	26.5%
Unknown	0	0.0%	0	0.0%	3	3.9%	18	2.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	77	100.0%	850	100.0%	77	100.0%	850	100.0%
	Consumer Loan Totals							
Low	2	1.6%	27	1.2%	19	14.7%	154	7.1%
Moderate	15	11.6%	243	11.2%	33	25.6%	381	17.5%

Low/Moderate Total	17	13.2%	270	12.4%	52	40.3%	535	24.6%
Middle	103	79.8%	1,575	72.5%	31	24.0%	547	25.2%
Upper	9	7.0%	326	15.0%	42	32.6%	1,061	48.9%
Unknown	0	0.0%	0	0.0%	4	3.1%	28	1.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	129	100.0%	2,171	100.0%	129	100.0%	2,171	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Klamath Falls-Roseburg, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	5	10.9%	53	6.0%
Moderate	7	15.2%	161	18.2%	13	28.3%	270	30.5%
Low/Moderate Total	7	15.2%	161	18.2%	18	39.1%	323	36.5%
Middle	33	71.7%	599	67.8%	12	26.1%	212	24.0%
Upper	6	13.0%	124	14.0%	16	34.8%	349	39.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	46	100.0%	884	100.0%	46	100.0%	884	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	3	11.1%	36	5.4%
Moderate	2	7.4%	48	7.2%	3	11.1%	93	14.0%
Low/Moderate Total	2	7.4%	48	7.2%	6	22.2%	129	19.5%
Middle	21	77.8%	515	77.7%	7	25.9%	211	31.8%
Upper	4	14.8%	100	15.1%	14	51.9%	323	48.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	663	100.0%	27	100.0%	663	100.0%
	Other - Unsecured							
Low	1	2.5%	11	1.9%	6	15.0%	43	7.6%
Moderate	6	15.0%	66	11.6%	12	30.0%	140	24.6%
Low/Moderate Total	7	17.5%	77	13.6%	18	45.0%	183	32.2%
Middle	28	70.0%	421	74.1%	8	20.0%	151	26.6%
Upper	5	12.5%	70	12.3%	9	22.5%	161	28.3%
Unknown	0	0.0%	0	0.0%	5	12.5%	73	12.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	568	100.0%	40	100.0%	568	100.0%
	Consumer Loan Totals							
Low	1	0.9%	11	0.5%	14	12.4%	132	6.2%
Moderate	15	13.3%	275	13.0%	28	24.8%	503	23.8%
Low/Moderate Total	16	14.2%	286	13.5%	42	37.2%	635	30.0%

Middle	82	72.6%	1,535	72.6%	27	23.9%	574	27.1%
Upper	15	13.3%	294	13.9%	39	34.5%	833	39.4%
Unknown	0	0.0%	0	0.0%	5	4.4%	73	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	113	100.0%	2,115	100.0%	113	100.0%	2,115	100.0%

2020 Klamath Falls-Roseburg, OR AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.8	848	1.4	288	34.0	13,668	21.9
Moderate	8	14.0	7,083	11.3	1,610	22.7	12,081	19.3
Middle	40	70.2	47,984	76.7	5,936	12.4	12,727	20.3
Upper	6	10.5	6,638	10.6	562	8.5	24,077	38.5
Unknown	2	3.5	0	0.0	0	0.0	0	0.0
Total AA	**57**	**100.0**	**62,553**	**100.0**	**8,396**	**13.4**	**62,553**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,648	517	0.8	31.4	942	57.2	189	11.5
Moderate	13,711	6,602	10.3	48.2	5,215	38.0	1,894	13.8
Middle	85,865	50,214	78.5	58.5	23,316	27.2	12,335	14.4
Upper	11,101	6,647	10.4	59.9	3,421	30.8	1,033	9.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**112,325**	**63,980**	**100.0**	**57.0**	**32,894**	**29.3**	**15,451**	**13.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	178	1.5	160	1.5	18	2.7	0	0.0
Moderate	1,615	13.8	1,488	13.7	110	16.6	17	13.2
Middle	8,486	72.7	7,927	72.8	450	67.8	109	84.5
Upper	1,396	12.0	1,307	12.0	86	13.0	3	2.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11,675**	**100.0**	**10,882**	**100.0**	**664**	**100.0**	**129**	**100.0**
Percentage of Total Businesses:				**93.2**		**5.7**		**1.1**

2020 Klamath Falls-Roseburg, OR AA Demographics								
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.1	1	0.1	0	0.0	0	0.0
Moderate	58	6.3	53	6.1	5	9.4	0	0.0
Middle	787	85.1	741	85.0	46	86.8	0	0.0
Upper	79	8.5	77	8.8	2	3.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**925**	**100.0**	**872**	**100.0**	**53**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**94.3**		**5.7**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Laramie, WY													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	4.7	4.7	569	2.8	2.9	0	0.0	2.8	0	0.0	1.8	3.4
Moderate	7	8.1	5.0	1,299	6.5	4.1	6	11.1	5.2	904	6.3	4.2	5.5
Middle	75	87.2	90.3	18,217	90.7	93.0	48	88.9	92.0	13,493	93.7	94.1	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	86	100.0	100.0	20,085	100.0	100.0	54	100.0	100.0	14,397	100.0	100.0	100.0
Refinance Loans													
Low	3	8.3	2.7	664	9.7	2.2	2	3.7	2.4	354	2.9	1.6	3.4
Moderate	3	8.3	3.4	308	4.5	2.1	3	5.6	5.2	476	3.9	3.8	5.5
Middle	30	83.3	93.8	5,874	85.8	95.7	49	90.7	92.5	11,456	93.2	94.6	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	36	100.0	100.0	6,846	100.0	100.0	54	100.0	100.0	12,286	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	9.5	0	0.0	14.6	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	0	0.0	0.0	0	0.0	0.0	2	28.6	23.1	100	26.7	14.9	5.5

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Laramie, WY													
Middle	15	100.0	90.5	904	100.0	85.4	5	71.4	76.9	275	73.3	85.1	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	904	100.0	100.0	7	100.0	100.0	375	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	50.0	40.0	150	68.2	24.1	4	50.0	33.3	1,663	43.5	18.6	13.7
Moderate	0	0.0	0.0	0	0.0	0.0	3	37.5	41.7	1,530	40.0	32.1	15.2
Middle	1	50.0	60.0	70	31.8	75.9	1	12.5	25.0	628	16.4	49.3	71.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	220	100.0	100.0	8	100.0	100.0	3,821	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	10	6.7	4.5	1,450	5.1	3.0	6	4.7	2.8	2,017	6.5	2.1	3.4
Moderate	11	7.4	4.7	1,647	5.8	3.5	14	10.9	5.8	3,010	9.6	4.8	5.5
Middle	128	85.9	90.9	25,393	89.1	93.5	108	84.4	91.4	26,168	83.9	93.1	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	28,490	100.0	100.0	128	100.0	100.0	31,195	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Laramie, WY													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	1	14.3	5.6	25	7.1	1.8	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	1	14.3	16.7	40	11.4	12.5	0	0.0	0.0	0	0.0	0.0	5.5
Middle	5	71.4	77.8	286	81.5	85.7	4	100.0	100.0	251	100.0	100.0	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	351	100.0	100.0	4	100.0	100.0	251	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Laramie, WY													
Other Purpose Closed/Exempt													
Low	1	33.3	8.3	42	50.0	2.7	0	0.0	0.0	0	0.0	0.0	3.4
Moderate	0	0.0	8.3	0	0.0	8.4	0	0.0	25.0	0	0.0	21.2	5.5
Middle	2	66.7	83.3	42	50.0	88.9	1	100.0	75.0	65	100.0	78.8	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	84	100.0	100.0	1	100.0	100.0	65	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	7.1	0	0.0	0.2	3.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	15.9	5.5
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	78.6	0	0.0	83.9	91.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Laramie, WY													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	4.7	5.9	652	3.2	4.0	1	1.9	4.7	145	1.0	2.5	26.7
Moderate	17	19.8	23.6	3,035	15.1	17.8	8	14.8	21.0	1,186	8.2	15.9	16.5
Middle	16	18.6	21.6	3,652	18.2	22.1	13	24.1	25.5	3,983	27.7	27.1	21.1
Upper	45	52.3	36.4	12,053	60.0	42.5	25	46.3	37.1	7,759	53.9	42.9	35.7
Unknown	4	4.7	12.5	693	3.5	13.6	7	13.0	11.6	1,324	9.2	11.6	0.0
Total	86	100.0	100.0	20,085	100.0	100.0	54	100.0	100.0	14,397	100.0	100.0	100.0
Refinance Loans													
Low	6	16.7	6.9	763	11.1	3.9	2	3.7	3.9	149	1.2	2.3	26.7
Moderate	2	5.6	17.2	377	5.5	13.9	10	18.5	17.0	1,671	13.6	12.9	16.5
Middle	9	25.0	23.4	1,223	17.9	20.2	12	22.2	23.2	2,349	19.1	21.6	21.1
Upper	15	41.7	35.7	3,794	55.4	43.3	24	44.4	37.1	6,376	51.9	43.2	35.7
Unknown	4	11.1	16.8	689	10.1	18.7	6	11.1	18.8	1,741	14.2	20.0	0.0
Total	36	100.0	100.0	6,846	100.0	100.0	54	100.0	100.0	12,286	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Laramie, WY

Home Improvement Loans													
Low	0	0.0	4.8	0	0.0	0.2	0	0.0	7.7	0	0.0	3.9	26.7
Moderate	3	20.0	23.8	96	10.6	16.3	2	28.6	23.1	120	32.0	8.9	16.5
Middle	2	13.3	14.3	55	6.1	11.4	0	0.0	7.7	0	0.0	21.9	21.1
Upper	10	66.7	57.1	753	83.3	72.0	3	42.9	46.2	200	53.3	62.0	35.7
Unknown	0	0.0	0.0	0	0.0	0.0	2	28.6	15.4	55	14.7	3.3	0.0
Total	15	100.0	100.0	904	100.0	100.0	7	100.0	100.0	375	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	12	8.2	6.3	1,475	5.2	3.9	4	3.3	4.2	324	1.2	2.4	26.7
Moderate	23	15.6	21.3	3,569	12.6	16.5	20	16.7	18.5	2,977	10.9	14.1	16.5
Middle	29	19.7	21.8	4,972	17.6	21.4	26	21.7	23.8	6,385	23.3	23.8	21.1
Upper	74	50.3	37.1	16,775	59.3	43.0	55	45.8	37.1	14,568	53.2	43.1	35.7
Unknown	9	6.1	13.6	1,479	5.2	15.2	15	12.5	16.3	3,120	11.4	16.6	0.0
Total	147	100.0	100.0	28,270	100.0	100.0	120	100.0	100.0	27,374	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Laramie, WY

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	14.3	11.1	18	5.1	2.7	1	25.0	14.3	30	12.0	7.7	26.7
Moderate	1	14.3	11.1	61	17.4	15.1	0	0.0	0.0	0	0.0	0.0	16.5
Middle	0	0.0	5.6	0	0.0	7.0	1	25.0	28.6	53	21.1	25.4	21.1
Upper	4	57.1	66.7	175	49.9	68.2	2	50.0	57.1	168	66.9	66.8	35.7
Unknown	1	14.3	5.6	97	27.6	7.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	351	100.0	100.0	4	100.0	100.0	251	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	1	33.3	8.3	42	50.0	2.7	0	0.0	0.0	0	0.0	0.0	26.7
Moderate	0	0.0	8.3	0	0.0	10.5	0	0.0	25.0	0	0.0	20.6	16.5
Middle	2	66.7	33.3	42	50.0	35.8	0	0.0	8.3	0	0.0	4.2	21.1
Upper	0	0.0	41.7	0	0.0	41.5	1	100.0	58.3	65	100.0	69.1	35.7
Unknown	0	0.0	8.3	0	0.0	9.5	0	0.0	8.3	0	0.0	6.1	0.0
Total	3	100.0	100.0	84	100.0	100.0	1	100.0	100.0	65	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.5

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Laramie, WY

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	35.7
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Laramie, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	8	7.5	9.4	1,213	12.8	15.2	51	17.6	11.0	3,236	17.1	15.3	13.0
Moderate	30	28.3	22.8	3,446	36.3	23.9	78	27.0	22.5	5,494	29.0	26.2	19.7
Middle	68	64.2	64.0	4,830	50.9	59.6	160	55.4	65.7	10,247	54.0	58.5	67.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.8	0	0.0	1.3	0	0.0	0.8	0	0.0	0.1	
Total	106	100.0	100.0	9,489	100.0	100.0	289	100.0	100.0	18,977	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Laramie, WY

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	78	73.6	53.8	5,562	58.6	46.1	59	20.4	53.2	4,361	23.0	42.4	92.1
Over $1 Million	24	22.6		3,430	36.1		30	10.4		4,560	24.0		6.8
Revenue Unknown	4	3.8		497	5.2		200	69.2		10,056	53.0		1.1
Total	106	100.0		9,489	100.0		289	100.0		18,977	100.0		100.0
By Loan Size													
$100,000 or Less	80	75.5	92.6	2,290	24.1	40.5	245	84.8	87.8	6,762	35.6	28.0	
$100,001 - $250,000	13	12.3	4.2	2,367	24.9	23.4	28	9.7	6.1	4,782	25.2	17.8	

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Laramie, WY													
$250,001 - $1 Million	13	12.3	3.1	4,832	50.9	36.1	16	5.5	6.1	7,433	39.2	54.2	
Total	106	100.0	100.0	9,489	100.0	100.0	289	100.0	100.0	18,977	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	62	79.5		1,544	27.8		49	83.1		1,102	25.3		
$100,001 - $250,000	9	11.5		1,706	30.7		6	10.2		1,118	25.6		
$250,001 - $1 Million	7	9.0		2,312	41.6		4	6.8		2,141	49.1		
Total	78	100.0		5,562	100.0		59	100.0		4,361	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Laramie, WY													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	1	12.5	3.3	75	11.3	3.9	0	0.0	0.0	0	0.0	0.0	5.3
Moderate	0	0.0	3.3	0	0.0	0.3	0	0.0	10.3	0	0.0	1.4	3.5
Middle	7	87.5	93.3	589	88.7	95.8	4	100.0	89.7	319	100.0	98.6	91.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	664	100.0	100.0	4	100.0	100.0	319	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Laramie, WY

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	1	4.8%	33	6.3%	4	19.0%	52	10.0%
Moderate	2	9.5%	53	10.2%	4	19.0%	87	16.7%
Low/Moderate Total	3	14.3%	86	16.5%	8	38.1%	139	26.7%
Middle	18	85.7%	434	83.5%	3	14.3%	130	25.0%
Upper	0	0.0%	0	0.0%	8	38.1%	186	35.8%
Unknown	0	0.0%	0	0.0%	2	9.5%	65	12.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	520	100.0%	21	100.0%	520	100.0%
	Other - Secured							
Low	2	8.7%	33	8.9%	4	17.4%	54	14.6%
Moderate	1	4.3%	15	4.1%	7	30.4%	89	24.1%
Low/Moderate Total	3	13.0%	48	13.0%	11	47.8%	143	38.6%
Middle	20	87.0%	322	87.0%	3	13.0%	23	6.2%
Upper	0	0.0%	0	0.0%	9	39.1%	204	55.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	370	100.0%	23	100.0%	370	100.0%
	Other - Unsecured							
Low	2	6.9%	7	1.4%	9	31.0%	77	15.1%
Moderate	1	3.4%	25	4.9%	6	20.7%	61	11.9%
Low/Moderate Total	3	10.3%	32	6.3%	15	51.7%	138	27.0%
Middle	26	89.7%	479	93.7%	5	17.2%	127	24.9%
Upper	0	0.0%	0	0.0%	8	27.6%	243	47.6%
Unknown	0	0.0%	0	0.0%	1	3.4%	3	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	511	100.0%	29	100.0%	511	100.0%
	Consumer Loan Totals							
Low	5	6.8%	73	5.2%	17	23.3%	183	13.1%
Moderate	4	5.5%	93	6.6%	17	23.3%	237	16.9%
Low/Moderate Total	9	12.3%	166	11.8%	34	46.6%	420	30.0%

Middle	64	87.7%	1,235	88.2%	11	15.1%	280	20.0%
Upper	0	0.0%	0	0.0%	25	34.2%	633	45.2%
Unknown	0	0.0%	0	0.0%	3	4.1%	68	4.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	1,401	100.0%	73	100.0%	1,401	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Laramie, WY

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	4	23.5%	49	10.2%	2	11.8%	17	3.5%
Moderate	1	5.9%	11	2.3%	3	17.6%	60	12.5%
Low/Moderate Total	5	29.4%	60	12.5%	5	29.4%	77	16.1%
Middle	12	70.6%	419	87.5%	4	23.5%	125	26.1%
Upper	0	0.0%	0	0.0%	8	47.1%	277	57.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	479	100.0%	17	100.0%	479	100.0%
	Other - Secured							
Low	1	7.7%	12	3.6%	2	15.4%	15	4.5%
Moderate	2	15.4%	31	9.3%	1	7.7%	2	0.6%
Low/Moderate Total	3	23.1%	43	12.9%	3	23.1%	17	5.1%
Middle	10	76.9%	291	87.1%	4	30.8%	92	27.5%
Upper	0	0.0%	0	0.0%	6	46.2%	225	67.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	334	100.0%	13	100.0%	334	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	23.1%	30	11.6%	4	30.8%	37	14.3%
Low/Moderate Total	3	23.1%	30	11.6%	4	30.8%	37	14.3%
Middle	10	76.9%	228	88.4%	5	38.5%	115	44.6%
Upper	0	0.0%	0	0.0%	4	30.8%	106	41.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	258	100.0%	13	100.0%	258	100.0%
	Consumer Loan Totals							
Low	5	11.6%	61	5.7%	4	9.3%	32	3.0%
Moderate	6	14.0%	72	6.7%	8	18.6%	99	9.2%
Low/Moderate Total	11	25.6%	133	12.4%	12	27.9%	131	12.2%

Middle	32	74.4%	938	87.6%	13	30.2%	332	31.0%
Upper	0	0.0%	0	0.0%	18	41.9%	608	56.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	43	100.0%	1,071	100.0%	43	100.0%	1,071	100.0%

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Laramie, WY

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	8	100.0	70.0	664	100.0	95.6	4	100.0	65.5	319	100.0	79.2	100.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	8	100.0		664	100.0		4	100.0		319	100.0		100.0
By Loan Size													
$100,000 or Less	6	75.0	83.3	281	42.3	37.6	3	75.0	82.8	69	21.6	37.8	
$100,001 - $250,000	2	25.0	13.3	383	57.7	37.5	1	25.0	17.2	250	78.4	62.2	
$250,001 - $500,000	0	0.0	3.3	0	0.0	25.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	664	100.0	100.0	4	100.0	100.0	319	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	6	75.0		281	42.3		3	75.0		69	21.6		
$100,001 - $250,000	2	25.0		383	57.7		1	25.0		250	78.4		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	8	100.0		664	100.0		4	100.0		319	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2020 Laramie, WY AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	20.0	530	7.0	148	27.9	2,025	26.7
Moderate	1	10.0	491	6.5	81	16.5	1,256	16.5
Middle	7	70.0	6,574	86.6	777	11.8	1,603	21.1

Upper	0	0.0	0	0.0	0	0.0	2,711	35.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**7,595**	**100.0**	**1,006**	**13.2**	**7,595**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,641	255	3.4	15.5	1,212	73.9	174	10.6
Moderate	2,018	420	5.5	20.8	1,445	71.6	153	7.6
Middle	14,878	6,916	91.1	46.5	5,414	36.4	2,548	17.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**18,537**	**7,591**	**100.0**	**41.0**	**8,071**	**43.5**	**2,875**	**15.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	216	13.0	193	12.6	22	19.5	1	5.3
Moderate	328	19.7	301	19.6	21	18.6	6	31.6
Middle	1,123	67.4	1,041	67.8	70	61.9	12	63.2
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,667**	**100.0**	**1,535**	**100.0**	**113**	**100.0**	**19**	**100.0**
Percentage of Total Businesses:				**92.1**		**6.8**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	5.3	3	5.3	0	0.0	0	0.0
Moderate	2	3.5	2	3.5	0	0.0	0	0.0
Middle	52	91.2	52	91.2	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**57**	**100.0**	**57**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Madras, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.0	0	0.0	11.9	0	0.0	10.3	0	0.0	9.1	10.9
Middle	2	100.0	85.0	422	100.0	88.1	1	100.0	89.7	284	100.0	90.9	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	422	100.0	100.0	1	100.0	100.0	284	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	40.0	9.2	177	23.3	6.4	0	0.0	10.3	0	0.0	8.0	10.9
Middle	3	60.0	90.8	583	76.7	93.6	3	100.0	89.2	957	100.0	91.6	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	760	100.0	100.0	3	100.0	100.0	957	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.1	0	0.0	11.0	0	0.0	10.0	0	0.0	7.0	10.9
Middle	2	100.0	95.9	100	100.0	89.0	3	100.0	90.0	515	100.0	93.0	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	100	100.0	100.0	3	100.0	100.0	515	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	54.1
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	45.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	20.0	11.6	177	12.8	9.4	1	12.5	10.3	98	5.3	8.6	10.9
Middle	8	80.0	88.4	1,205	87.2	90.6	7	87.5	89.4	1,756	94.7	91.3	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Madras, OR													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,382	100.0	100.0	8	100.0	100.0	1,854	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Madras, OR													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	100.0	6.7	98	100.0	11.7	10.9
Middle	1	100.0	100.0	100	100.0	100.0	0	0.0	93.3	0	0.0	88.3	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	100	100.0	100.0	1	100.0	100.0	98	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	16.7	0	0.0	15.4	0	0.0	13.5	10.9
Middle	0	0.0	75.0	0	0.0	83.3	0	0.0	84.6	0	0.0	86.5	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	15.8	0	0.0	11.7	10.9
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	84.2	0	0.0	88.3	89.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Madras, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.8	0	0.0	0.9	0	0.0	1.1	0	0.0	0.6	22.4
Moderate	0	0.0	14.6	0	0.0	10.6	0	0.0	16.5	0	0.0	12.9	17.1
Middle	0	0.0	26.1	0	0.0	25.2	0	0.0	26.4	0	0.0	24.7	22.4
Upper	2	100.0	40.2	422	100.0	46.9	1	100.0	41.6	284	100.0	48.5	38.1
Unknown	0	0.0	17.2	0	0.0	16.4	0	0.0	14.5	0	0.0	13.3	0.0
Total	2	100.0	100.0	422	100.0	100.0	1	100.0	100.0	284	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.6	0	0.0	5.3	0	0.0	2.6	0	0.0	1.2	22.4
Moderate	1	20.0	9.4	180	23.7	6.7	0	0.0	9.7	0	0.0	7.3	17.1
Middle	2	40.0	19.8	403	53.0	17.1	0	0.0	19.3	0	0.0	16.9	22.4
Upper	2	40.0	36.6	177	23.3	40.7	3	100.0	38.4	957	100.0	43.1	38.1
Unknown	0	0.0	27.6	0	0.0	30.3	0	0.0	30.1	0	0.0	31.5	0.0
Total	5	100.0	100.0	760	100.0	100.0	3	100.0	100.0	957	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.0	0	0.0	2.7	0	0.0	6.7	0	0.0	1.7	22.4
Moderate	0	0.0	10.2	0	0.0	13.1	0	0.0	6.7	0	0.0	4.2	17.1
Middle	0	0.0	20.4	0	0.0	25.8	1	33.3	26.7	340	66.0	29.2	22.4
Upper	2	100.0	63.3	100	100.0	55.3	2	66.7	56.7	175	34.0	59.4	38.1
Unknown	0	0.0	4.1	0	0.0	3.1	0	0.0	3.3	0	0.0	5.5	0.0
Total	2	100.0	100.0	100	100.0	100.0	3	100.0	100.0	515	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	4.1	0	0.0	2.9	0	0.0	2.1	0	0.0	0.9	22.4
Moderate	1	10.0	12.4	180	13.0	9.0	1	12.5	12.5	98	5.3	9.8	17.1
Middle	3	30.0	22.4	503	36.4	21.4	1	12.5	21.9	340	18.3	20.4	22.4
Upper	6	60.0	40.3	699	50.6	44.5	6	75.0	40.0	1,416	76.4	45.6	38.1
Unknown	0	0.0	20.8	0	0.0	22.3	0	0.0	23.4	0	0.0	23.3	0.0
Total	10	100.0	100.0	1,382	100.0	100.0	8	100.0	100.0	1,854	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Madras, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	6.7	0	0.0	1.6	0	0.0	6.7	0	0.0	11.9	22.4
Moderate	0	0.0	16.7	0	0.0	7.2	1	100.0	13.3	98	100.0	13.7	17.1
Middle	1	100.0	16.7	100	100.0	21.5	0	0.0	6.7	0	0.0	6.0	22.4
Upper	0	0.0	56.7	0	0.0	66.3	0	0.0	73.3	0	0.0	68.5	38.1
Unknown	0	0.0	3.3	0	0.0	3.4	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	100	100.0	100.0	1	100.0	100.0	98	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.3	0	0.0	7.0	0	0.0	7.7	0	0.0	1.4	22.4
Moderate	0	0.0	33.3	0	0.0	28.4	0	0.0	30.8	0	0.0	10.5	17.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	15.4	0	0.0	5.8	22.4
Upper	0	0.0	58.3	0	0.0	64.6	0	0.0	46.2	0	0.0	82.2	38.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	38.1
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Madras, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	40.0	10.6	181	48.8	7.6	16	41.0	14.6	530	18.5	9.1	17.5
Middle	3	60.0	85.1	190	51.2	91.1	23	59.0	83.1	2,337	81.5	89.8	82.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Madras, OR

Tract-Unk	0	0.0	4.3	0	0.0	1.2	0	0.0	2.2	0	0.0	1.1	
Total	5	100.0	100.0	371	100.0	100.0	39	100.0	100.0	2,867	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Madras, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	4	80.0	51.3	355	95.7	38.5	16	41.0	51.6	1,241	43.3	33.1	92.7
Over $1 Million	0	0.0		0	0.0		4	10.3		606	21.1		5.3
Revenue Unknown	1	20.0		16	4.3		19	48.7		1,020	35.6		2.0
Total	5	100.0		371	100.0		39	100.0		2,867	100.0		100.0
By Loan Size													
$100,000 or Less	3	60.0	94.0	71	19.1	36.9	30	76.9	89.5	775	27.0	33.7	
$100,001 - $250,000	2	40.0	2.6	300	80.9	14.4	6	15.4	6.1	937	32.7	18.2	
$250,001 - $1 Million	0	0.0	3.3	0	0.0	48.8	3	7.7	4.5	1,155	40.3	48.1	
Total	5	100.0	100.0	371	100.0	100.0	39	100.0	100.0	2,867	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	50.0		55	15.5		12	75.0		253	20.4		
$100,001 - $250,000	2	50.0		300	84.5		2	12.5		260	21.0		
$250,001 - $1 Million	0	0.0		0	0.0		2	12.5		728	58.7		
Total	4	100.0		355	100.0		16	100.0		1,241	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Madras, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	4.6
Middle	2	100.0	97.0	74	100.0	99.6	0	0.0	100.0	0	0.0	100.0	95.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.0	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	74	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Madras, OR

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	50.0	56.7	5	6.8	69.7	0	0.0	46.7	0	0.0	61.4	95.4
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		3.7
Revenue Unknown	1	50.0		69	93.2		0	0.0		0	0.0		0.9
Total	2	100.0		74	100.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	2	100.0	77.6	74	100.0	19.8	0	0.0	60.0	0	0.0	17.0	
$100,001 - $250,000	0	0.0	14.9	0	0.0	37.3	0	0.0	24.4	0	0.0	28.9	
$250,001 - $500,000	0	0.0	7.5	0	0.0	42.8	0	0.0	15.6	0	0.0	54.1	
Total	2	100.0	100.0	74	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		5	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Madras, OR													
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		5	100.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Madras, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	10.0%	33	14.5%	0	0.0%	0	0.0%
Low/Moderate Total	1	10.0%	33	14.5%	0	0.0%	0	0.0%
Middle	9	90.0%	195	85.5%	5	50.0%	115	50.4%
Upper	0	0.0%	0	0.0%	5	50.0%	113	49.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	228	100.0%	10	100.0%	228	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	11.1%	30	16.9%
Low/Moderate Total	0	0.0%	0	0.0%	1	11.1%	30	16.9%
Middle	9	100.0%	178	100.0%	4	44.4%	37	20.8%
Upper	0	0.0%	0	0.0%	4	44.4%	111	62.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	178	100.0%	9	100.0%	178	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	22.2%	10	8.6%
Moderate	3	33.3%	44	37.9%	1	11.1%	7	6.0%

Low/Moderate Total	3	33.3%	44	37.9%	3	33.3%	17	14.7%
Middle	6	66.7%	72	62.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	5	55.6%	93	80.2%
Unknown	0	0.0%	0	0.0%	1	11.1%	6	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	116	100.0%	9	100.0%	116	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	7.1%	10	1.9%
Moderate	4	14.3%	77	14.8%	2	7.1%	37	7.1%
Low/Moderate Total	4	14.3%	77	14.8%	4	14.3%	47	9.0%
Middle	24	85.7%	445	85.2%	9	32.1%	152	29.1%
Upper	0	0.0%	0	0.0%	14	50.0%	317	60.7%
Unknown	0	0.0%	0	0.0%	1	3.6%	6	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	522	100.0%	28	100.0%	522	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Madras, OR

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	25	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	25	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	25	100.0%	2	100.0%	25	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	16.7%	15	7.1%
Moderate	2	33.3%	76	35.8%	1	16.7%	33	15.6%
Low/Moderate Total	2	33.3%	76	35.8%	2	33.3%	48	22.6%
Middle	4	66.7%	136	64.2%	1	16.7%	8	3.8%
Upper	0	0.0%	0	0.0%	3	50.0%	156	73.6%

Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	212	100.0%	6	100.0%	212	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	22.2%	55	15.7%
Low/Moderate Total	0	0.0%	0	0.0%	2	22.2%	55	15.7%
Middle	9	100.0%	350	100.0%	1	11.1%	22	6.3%
Upper	0	0.0%	0	0.0%	6	66.7%	273	78.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	350	100.0%	9	100.0%	350	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	5.9%	15	2.6%
Moderate	2	11.8%	76	12.9%	3	17.6%	88	15.0%
Low/Moderate Total	2	11.8%	76	12.9%	4	23.5%	103	17.5%
Middle	15	88.2%	511	87.1%	2	11.8%	30	5.1%
Upper	0	0.0%	0	0.0%	11	64.7%	454	77.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	587	100.0%	17	100.0%	587	100.0%

2020 Madras, OR 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	1,208	22.4
Moderate	1	16.7	790	14.7	162	20.5	918	17.1
Middle	5	83.3	4,594	85.3	628	13.7	1,206	22.4
Upper	0	0.0	0	0.0	0	0.0	2,052	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**5,384**	**100.0**	**790**	**14.7**	**5,384**	**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	1,367	561	10.9	41.0	562	41.1	244	17.8
Middle	8,422	4,575	89.1	54.3	1,994	23.7	1,853	22.0
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**9,789**	**5,136**	**100.0**	**52.5**	**2,556**	**26.1**	**2,097**	**21.4**

2020 Madras, OR AA Demographics								
	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	140	17.5	129	17.4	8	19.0	3	18.8
Middle	659	82.5	612	82.6	34	81.0	13	81.3
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**799**	**100.0**	**741**	**100.0**	**42**	**100.0**	**16**	**100.0**
Percentage of Total Businesses:				**92.7**		**5.3**		**2.0**
	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	5	4.6	5	4.8	0	0.0	0	0.0
Middle	104	95.4	99	95.2	4	100.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**109**	**100.0**	**104**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**95.4**		**3.7**		**0.9**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Missoula, MT MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	2.1	0.8	542	1.5	0.7	0	0.0	0.3	0	0.0	0.3	0.5
Moderate	22	15.1	17.3	3,769	10.2	13.3	21	18.6	16.7	4,311	13.7	13.3	12.6
Middle	88	60.3	63.5	22,801	62.0	63.6	62	54.9	62.8	17,835	56.8	63.4	67.3
Upper	33	22.6	18.4	9,674	26.3	22.4	30	26.5	20.2	9,266	29.5	23.0	19.5

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Missoula, MT MSA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	146	100.0	100.0	36,786	100.0	100.0	113	100.0	100.0	31,412	100.0	100.0	100.0
Refinance Loans													
Low	1	0.8	0.5	484	1.8	0.5	2	0.6	0.5	272	0.4	0.4	0.5
Moderate	12	9.3	10.9	2,401	9.2	7.9	26	8.4	11.9	4,858	6.4	8.9	12.6
Middle	74	57.4	67.6	14,708	56.1	68.7	194	62.4	64.7	48,508	63.7	65.5	67.3
Upper	42	32.6	21.0	8,610	32.9	22.8	89	28.6	23.0	22,540	29.6	25.2	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	129	100.0	100.0	26,203	100.0	100.0	311	100.0	100.0	76,178	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	2	5.7	11.6	93	3.3	10.1	12	16.9	10.6	731	13.2	8.5	12.6
Middle	22	62.9	62.3	1,625	58.4	58.9	40	56.3	62.6	3,526	63.9	64.2	67.3
Upper	11	31.4	26.1	1,064	38.2	31.0	19	26.8	26.8	1,260	22.8	27.3	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	2,782	100.0	100.0	71	100.0	100.0	5,517	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	25.0	9.5	900	23.6	13.5	0	0.0	8.1	0	0.0	5.5	12.7
Moderate	2	50.0	52.4	1,202	31.5	22.3	6	66.7	45.9	9,979	57.0	16.9	28.6
Middle	0	0.0	33.3	0	0.0	60.3	3	33.3	43.2	7,530	43.0	73.8	44.7
Upper	1	25.0	4.8	1,710	44.9	3.9	0	0.0	2.7	0	0.0	3.8	14.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	3,812	100.0	100.0	9	100.0	100.0	17,509	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	6	1.7	0.8	2,121	2.9	1.2	2	0.4	0.4	272	0.2	0.7	0.5
Moderate	42	12.1	14.5	7,666	10.5	11.5	68	12.3	13.4	19,974	14.7	10.8	12.6
Middle	205	59.1	65.2	41,413	56.8	65.4	331	59.7	64.1	80,773	59.6	65.4	67.3
Upper	94	27.1	19.5	21,666	29.7	21.9	153	27.6	22.1	34,586	25.5	23.1	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	347	100.0	100.0	72,866	100.0	100.0	554	100.0	100.0	135,605	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Missoula, MT MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	3.6	1.6	195	6.4	4.1	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	2	7.1	9.3	90	3.0	4.5	3	6.3	8.1	95	2.0	4.6	12.6
Middle	19	67.9	76.0	2,202	72.8	77.7	30	62.5	66.7	3,079	65.6	67.8	67.3
Upper	6	21.4	13.2	538	17.8	13.7	15	31.3	25.2	1,520	32.4	27.7	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	3,025	100.0	100.0	48	100.0	100.0	4,694	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.1	0	0.0	3.9	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	2	40.0	13.6	111	43.0	6.5	0	0.0	6.3	0	0.0	2.6	12.6
Middle	2	40.0	61.4	77	29.8	53.7	2	100.0	72.9	295	100.0	77.0	67.3
Upper	1	20.0	22.9	70	27.1	35.9	0	0.0	20.8	0	0.0	20.3	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	258	100.0	100.0	2	100.0	100.0	295	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.3	0	0.0	3.1	0.5
Moderate	0	0.0	21.7	0	0.0	15.5	0	0.0	11.6	0	0.0	10.0	12.6
Middle	0	0.0	73.9	0	0.0	82.8	0	0.0	74.4	0	0.0	72.4	67.3
Upper	0	0.0	4.3	0	0.0	1.6	0	0.0	11.6	0	0.0	14.5	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Missoula, MT MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	7	4.8	4.3	862	2.3	2.2	5	4.4	6.6	559	1.8	3.6	21.1
Moderate	16	11.0	18.0	3,086	8.4	13.4	18	15.9	21.1	4,026	12.8	17.2	18.2
Middle	27	18.5	23.3	6,093	16.6	22.0	18	15.9	25.4	4,273	13.6	24.8	20.8

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Missoula, MT MSA													
Upper	83	56.8	43.0	23,443	63.7	50.6	59	52.2	38.3	19,225	61.2	45.8	39.9
Unknown	13	8.9	11.4	3,302	9.0	11.7	13	11.5	8.6	3,329	10.6	8.6	0.0
Total	146	100.0	100.0	36,786	100.0	100.0	113	100.0	100.0	31,412	100.0	100.0	100.0
Refinance Loans													
Low	7	5.4	5.5	733	2.8	2.7	11	3.5	5.5	1,563	2.1	3.3	21.1
Moderate	19	14.7	16.0	2,304	8.8	11.6	35	11.3	17.0	6,143	8.1	13.4	18.2
Middle	20	15.5	22.2	4,083	15.6	19.9	79	25.4	24.7	16,659	21.9	22.8	20.8
Upper	77	59.7	42.2	17,135	65.4	48.9	163	52.4	37.8	46,906	61.6	44.0	39.9
Unknown	6	4.7	14.1	1,948	7.4	16.9	23	7.4	15.0	4,907	6.4	16.5	0.0
Total	129	100.0	100.0	26,203	100.0	100.0	311	100.0	100.0	76,178	100.0	100.0	100.0
Home Improvement Loans													
Low	2	5.7	6.0	95	3.4	5.1	6	8.5	9.8	448	8.1	8.4	21.1
Moderate	4	11.4	14.6	158	5.7	10.7	11	15.5	14.2	646	11.7	10.4	18.2
Middle	9	25.7	26.6	608	21.9	23.0	19	26.8	22.4	1,160	21.0	17.5	20.8
Upper	19	54.3	49.7	1,832	65.9	57.2	31	43.7	48.4	2,631	47.7	56.9	39.9
Unknown	1	2.9	3.0	89	3.2	4.0	4	5.6	5.3	632	11.5	6.8	0.0
Total	35	100.0	100.0	2,782	100.0	100.0	71	100.0	100.0	5,517	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	17	5.0	4.8	1,728	2.5	2.4	25	4.6	6.0	2,700	2.3	3.5	21.1
Moderate	42	12.2	16.6	5,681	8.2	12.5	70	12.8	18.0	11,327	9.6	14.6	18.2
Middle	62	18.1	23.3	11,381	16.5	21.2	126	23.1	24.7	22,676	19.2	23.2	20.8
Upper	201	58.6	43.4	44,800	64.9	50.1	283	51.9	38.6	72,485	61.4	45.0	39.9
Unknown	21	6.1	11.9	5,464	7.9	13.7	41	7.5	12.7	8,908	7.5	13.7	0.0
Total	343	100.0	100.0	69,054	100.0	100.0	545	100.0	100.0	118,096	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Missoula, MT MSA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	1	3.6	3.9	38	1.3	2.6	3	6.3	5.2	130	2.8	2.9	21.1
Moderate	3	10.7	8.5	133	4.4	3.6	6	12.5	10.4	512	10.9	6.8	18.2
Middle	5	17.9	29.5	555	18.3	28.3	10	20.8	20.0	584	12.4	14.0	20.8
Upper	18	64.3	55.0	2,174	71.9	62.9	28	58.3	61.5	3,428	73.0	73.1	39.9
Unknown	1	3.6	3.1	125	4.1	2.7	1	2.1	3.0	40	0.9	3.3	0.0
Total	28	100.0	100.0	3,025	100.0	100.0	48	100.0	100.0	4,694	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Missoula, MT MSA

Other Purpose Closed/Exempt													
Low	0	0.0	3.6	0	0.0	2.0	0	0.0	9.4	0	0.0	5.2	21.1
Moderate	0	0.0	14.3	0	0.0	10.0	0	0.0	16.7	0	0.0	10.1	18.2
Middle	1	20.0	31.4	42	16.3	22.7	0	0.0	25.0	0	0.0	12.8	20.8
Upper	4	80.0	49.3	216	83.7	61.9	2	100.0	46.9	295	100.0	69.7	39.9
Unknown	0	0.0	1.4	0	0.0	3.4	0	0.0	2.1	0	0.0	2.2	0.0
Total	5	100.0	100.0	258	100.0	100.0	2	100.0	100.0	295	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.2
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	2.3	0	0.0	2.5	20.8
Upper	0	0.0	4.3	0	0.0	6.9	0	0.0	0.0	0	0.0	0.0	39.9
Unknown	0	0.0	95.7	0	0.0	93.1	0	0.0	97.7	0	0.0	97.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Missoula, MT MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	28	13.3	11.2	4,851	20.5	17.6	99	14.9	12.3	13,338	19.0	19.0	11.1
Moderate	48	22.9	19.9	5,604	23.7	19.7	137	20.6	21.7	15,249	21.7	23.0	18.9
Middle	116	55.2	54.7	12,071	51.1	53.8	333	50.0	53.5	33,557	47.9	49.3	56.8
Upper	18	8.6	11.7	1,086	4.6	8.0	97	14.6	11.4	7,972	11.4	8.1	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.4	0	0.0	1.0	0	0.0	1.0	0	0.0	0.6	
Total	210	100.0	100.0	23,612	100.0	100.0	666	100.0	100.0	70,116	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Missoula, MT MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	114	54.3	50.1	9,050	38.3	35.4	299	44.9	49.4	23,464	33.5	32.0	92.4
Over $1 Million	83	39.5		12,576	53.3		85	12.8		19,680	28.1		6.9
Revenue Unknown	13	6.2		1,986	8.4		282	42.3		26,972	38.5		0.7
Total	210	100.0		23,612	100.0		666	100.0		70,116	100.0		100.0
By Loan Size													
$100,000 or Less	161	76.7	90.3	5,789	24.5	33.3	502	75.4	83.9	15,858	22.6	26.4	
$100,001 - $250,000	18	8.6	4.7	3,163	13.4	15.6	86	12.9	8.8	14,370	20.5	20.7	
$250,001 - $1 Million	31	14.8	5.1	14,660	62.1	51.1	78	11.7	7.3	39,888	56.9	52.9	
Total	210	100.0	100.0	23,612	100.0	100.0	666	100.0	100.0	70,116	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	95	83.3		2,741	30.3		240	80.3		6,400	27.3		
$100,001 - $250,000	8	7.0		1,298	14.3		34	11.4		5,514	23.5		
$250,001 - $1 Million	11	9.6		5,011	55.4		25	8.4		11,550	49.2		
Total	114	100.0		9,050	100.0		299	100.0		23,464	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Missoula, MT MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	2.2	0	0.0	2.3	0	0.0	8.3	0	0.0	5.7	2.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.6	0	0.0	6.9	9.6
Middle	1	100.0	91.3	39	100.0	90.2	0	0.0	77.8	0	0.0	67.5	77.5
Upper	0	0.0	4.3	0	0.0	1.8	0	0.0	5.6	0	0.0	13.6	10.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Missoula, MT MSA

Tract-Unk	0	0.0	2.2	0	0.0	5.7	0	0.0	2.8	0	0.0	6.4	
Total	1	100.0	100.0	39	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Missoula, MT MSA

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	65.2	0	0.0	81.1	0	0.0	55.6	0	0.0	55.1	97.6
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.4
Revenue Unknown	1	100.0		39	100.0		0	0.0		0	0.0		0.0
Total	1	100.0		39	100.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	1	100.0	93.5	39	100.0	69.7	0	0.0	94.4	0	0.0	76.7	
$100,001 - $250,000	0	0.0	6.5	0	0.0	30.3	0	0.0	5.6	0	0.0	23.3	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	39	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Missoula, MT MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	1	0.8%	57	1.7%	15	11.9%	291	8.9%
Moderate	19	15.1%	450	13.8%	25	19.8%	506	15.5%
Low/Moderate Total	20	15.9%	507	15.5%	40	31.7%	797	24.4%
Middle	90	71.4%	2,440	74.8%	32	25.4%	791	24.2%
Upper	16	12.7%	317	9.7%	53	42.1%	1,665	51.0%
Unknown	0	0.0%	0	0.0%	1	0.8%	11	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	3,264	100.0%	126	100.0%	3,264	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	12	11.9%	258	10.2%
Moderate	9	8.9%	91	3.6%	15	14.9%	252	9.9%
Low/Moderate Total	9	8.9%	91	3.6%	27	26.7%	510	20.1%
Middle	71	70.3%	1,780	70.1%	25	24.8%	443	17.5%
Upper	21	20.8%	667	26.3%	46	45.5%	1,443	56.9%
Unknown	0	0.0%	0	0.0%	3	3.0%	142	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	101	100.0%	2,538	100.0%	101	100.0%	2,538	100.0%
	Other - Unsecured							
Low	2	1.5%	10	0.3%	29	21.3%	281	9.2%
Moderate	20	14.7%	236	7.8%	24	17.6%	331	10.9%
Low/Moderate Total	22	16.2%	246	8.1%	53	39.0%	612	20.1%
Middle	81	59.6%	1,693	55.7%	31	22.8%	426	14.0%
Upper	33	24.3%	1,103	36.3%	49	36.0%	1,977	65.0%
Unknown	0	0.0%	0	0.0%	3	2.2%	27	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	136	100.0%	3,042	100.0%	136	100.0%	3,042	100.0%
	Consumer Loan Totals							
Low	3	0.8%	67	0.8%	56	15.4%	830	9.4%
Moderate	48	13.2%	777	8.8%	64	17.6%	1,089	12.3%
Low/Moderate Total	51	14.0%	844	9.5%	120	33.1%	1,919	21.7%

Middle	242	66.7%	5,913	66.9%	88	24.2%	1,660	18.8%
Upper	70	19.3%	2,087	23.6%	148	40.8%	5,085	57.5%
Unknown	0	0.0%	0	0.0%	7	1.9%	180	2.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	363	100.0%	8,844	100.0%	363	100.0%	8,844	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Missoula, MT MSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	19	17.4%	303	11.1%
Moderate	12	11.0%	223	8.2%	28	25.7%	565	20.8%
Low/Moderate Total	12	11.0%	223	8.2%	47	43.1%	868	31.9%
Middle	78	71.6%	2,017	74.1%	29	26.6%	774	28.4%
Upper	19	17.4%	482	17.7%	32	29.4%	1,062	39.0%
Unknown	0	0.0%	0	0.0%	1	0.9%	18	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	109	100.0%	2,722	100.0%	109	100.0%	2,722	100.0%
	Other - Secured							
Low	1	0.9%	3	0.1%	16	15.1%	255	9.0%
Moderate	11	10.4%	185	6.5%	20	18.9%	363	12.8%
Low/Moderate Total	12	11.3%	188	6.6%	36	34.0%	618	21.8%
Middle	80	75.5%	2,208	77.9%	24	22.6%	722	25.5%
Upper	14	13.2%	437	15.4%	45	42.5%	1,488	52.5%
Unknown	0	0.0%	0	0.0%	1	0.9%	5	0.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	106	100.0%	2,833	100.0%	106	100.0%	2,833	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	19	23.8%	189	12.0%
Moderate	9	11.3%	129	8.2%	20	25.0%	281	17.8%
Low/Moderate Total	9	11.3%	129	8.2%	39	48.8%	470	29.8%
Middle	52	65.0%	1,078	68.3%	16	20.0%	238	15.1%
Upper	19	23.8%	371	23.5%	23	28.8%	830	52.6%
Unknown	0	0.0%	0	0.0%	2	2.5%	40	2.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	80	100.0%	1,578	100.0%	80	100.0%	1,578	100.0%
	Consumer Loan Totals							
Low	1	0.3%	3	0.0%	54	18.3%	747	10.5%
Moderate	32	10.8%	537	7.5%	68	23.1%	1,209	16.9%
Low/Moderate Total	33	11.2%	540	7.6%	122	41.4%	1,956	27.4%

Middle	210	71.2%	5,303	74.3%	69	23.4%	1,734	24.3%
Upper	52	17.6%	1,290	18.1%	100	33.9%	3,380	47.4%
Unknown	0	0.0%	0	0.0%	4	1.4%	63	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	295	100.0%	7,133	100.0%	295	100.0%	7,133	100.0%

2020 Missoula, MT MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.0	187	0.7	24	12.8	5,614	21.1
Moderate	3	15.0	3,787	14.2	547	14.4	4,845	18.2
Middle	13	65.0	17,416	65.3	1,398	8.0	5,559	20.8
Upper	3	15.0	5,274	19.8	346	6.6	10,646	39.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**20**	**100.0**	**26,664**	**100.0**	**2,315**	**8.7**	**26,664**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,458	125	0.5	8.6	1,145	78.5	188	12.9
Moderate	9,623	3,443	12.6	35.8	5,762	59.9	418	4.3
Middle	31,946	18,337	67.3	57.4	10,039	31.4	3,570	11.2
Upper	8,029	5,323	19.5	66.3	2,450	30.5	256	3.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**51,056**	**27,228**	**100.0**	**53.3**	**19,396**	**38.0**	**4,432**	**8.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	824	11.1	737	10.7	77	15.1	10	18.5
Moderate	1,404	18.9	1,263	18.4	133	26.0	8	14.8
Middle	4,218	56.8	3,915	57.1	275	53.8	28	51.9
Upper	977	13.2	943	13.8	26	5.1	8	14.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7,423**	**100.0**	**6,858**	**100.0**	**511**	**100.0**	**54**	**100.0**

2020 Missoula, MT MSA AA Demographics								
Percentage of Total Businesses:			92.4		6.9		0.7	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	2.4	5	2.5	0	0.0	0	0.0
Moderate	20	9.6	19	9.3	1	20.0	0	0.0
Middle	162	77.5	158	77.5	4	80.0	0	0.0
Upper	22	10.5	22	10.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**209**	**100.0**	**204**	**100.0**	**5**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				97.6		2.4		0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Newport-Lincoln City, OR													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	28.6	2.4	350	23.9	2.6	0	0.0	3.3	0	0.0	3.1	2.0
Middle	4	57.1	77.3	893	61.0	75.6	2	100.0	77.4	528	100.0	77.6	84.6
Upper	1	14.3	20.2	220	15.0	21.7	0	0.0	19.2	0	0.0	19.3	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,463	100.0	100.0	2	100.0	100.0	528	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.1	0	0.0	1.0	1	25.0	2.5	231	21.1	2.3	2.0
Middle	0	0.0	78.9	0	0.0	76.9	3	75.0	77.9	864	78.9	77.0	84.6
Upper	1	100.0	20.0	145	100.0	22.1	0	0.0	19.5	0	0.0	20.7	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	145	100.0	100.0	4	100.0	100.0	1,095	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Newport-Lincoln City, OR													
Moderate	0	0.0	1.0	0	0.0	0.8	0	0.0	2.6	0	0.0	5.1	2.0
Middle	2	100.0	82.8	105	100.0	79.7	2	100.0	78.2	244	100.0	75.5	84.6
Upper	0	0.0	16.2	0	0.0	19.5	0	0.0	19.2	0	0.0	19.4	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	105	100.0	100.0	2	100.0	100.0	244	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	3.8	0	0.0	9.1	0	0.0	3.0	11.5
Middle	0	0.0	37.5	0	0.0	74.2	0	0.0	63.6	0	0.0	80.0	64.4
Upper	0	0.0	37.5	0	0.0	22.0	0	0.0	27.3	0	0.0	17.0	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	14.3	2.0	350	18.5	2.1	1	12.5	2.8	231	12.4	2.7	2.0
Middle	9	64.3	78.2	1,153	60.8	76.3	7	87.5	77.8	1,636	87.6	77.4	84.6
Upper	3	21.4	19.8	392	20.7	21.6	0	0.0	19.4	0	0.0	19.9	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,895	100.0	100.0	8	100.0	100.0	1,867	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Newport-Lincoln City, OR													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.3	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	2.0
Middle	3	75.0	82.7	155	85.2	85.5	0	0.0	78.1	0	0.0	77.3	84.6
Upper	1	25.0	16.0	27	14.8	14.1	0	0.0	21.9	0	0.0	22.7	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	182	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Newport-Lincoln City, OR													
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.3	0	0.0	9.2	0	0.0	0.0	0	0.0	0.0	2.0
Middle	0	0.0	75.0	0	0.0	81.8	0	0.0	72.4	0	0.0	64.7	84.6
Upper	0	0.0	18.8	0	0.0	9.0	0	0.0	27.6	0	0.0	35.3	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.0
Middle	0	0.0	82.6	0	0.0	77.6	0	0.0	90.6	0	0.0	89.2	84.6
Upper	0	0.0	17.4	0	0.0	22.4	0	0.0	9.4	0	0.0	10.8	13.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Newport-Lincoln City, OR													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.1	0	0.0	0.5	0	0.0	1.5	0	0.0	0.7	18.6
Moderate	1	14.3	7.9	100	6.8	5.1	1	50.0	11.9	200	37.9	8.0	18.8
Middle	2	28.6	20.7	433	29.6	16.8	0	0.0	20.5	0	0.0	17.3	21.7
Upper	4	57.1	61.2	930	63.6	68.8	1	50.0	56.7	328	62.1	65.3	40.9
Unknown	0	0.0	9.0	0	0.0	8.8	0	0.0	9.4	0	0.0	8.7	0.0
Total	7	100.0	100.0	1,463	100.0	100.0	2	100.0	100.0	528	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.1	0	0.0	2.8	0	0.0	2.6	0	0.0	1.4	18.6
Moderate	0	0.0	11.7	0	0.0	7.7	0	0.0	8.6	0	0.0	5.8	18.8
Middle	0	0.0	18.7	0	0.0	15.3	1	25.0	15.7	200	18.3	13.1	21.7
Upper	1	100.0	42.6	145	100.0	48.8	3	75.0	50.5	895	81.7	56.8	40.9
Unknown	0	0.0	22.9	0	0.0	25.4	0	0.0	22.6	0	0.0	22.9	0.0
Total	1	100.0	100.0	145	100.0	100.0	4	100.0	100.0	1,095	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	0.8	0	0.0	2.6	0	0.0	1.4	18.6

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Newport-Lincoln City, OR													
Moderate	0	0.0	14.1	0	0.0	10.2	0	0.0	15.4	0	0.0	10.6	18.8
Middle	0	0.0	15.2	0	0.0	17.4	0	0.0	29.5	0	0.0	23.0	21.7
Upper	2	100.0	66.7	105	100.0	71.4	2	100.0	50.0	244	100.0	60.0	40.9
Unknown	0	0.0	1.0	0	0.0	0.2	0	0.0	2.6	0	0.0	5.1	0.0
Total	2	100.0	100.0	105	100.0	100.0	2	100.0	100.0	244	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.3	0	0.0	1.3	0	0.0	2.2	0	0.0	1.1	18.6
Moderate	2	14.3	9.7	127	6.7	6.2	1	12.5	10.1	200	10.7	6.8	18.8
Middle	2	14.3	19.5	433	22.8	16.1	1	12.5	17.8	200	10.7	15.0	21.7
Upper	10	71.4	54.2	1,335	70.4	61.3	6	75.0	52.8	1,467	78.6	60.5	40.9
Unknown	0	0.0	14.3	0	0.0	15.1	0	0.0	17.2	0	0.0	16.6	0.0
Total	14	100.0	100.0	1,895	100.0	100.0	8	100.0	100.0	1,867	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Newport-Lincoln City, OR													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	0	0.0	1.3	0	0.0	0.6	0	0.0	6.3	0	0.0	2.9	18.6
Moderate	1	25.0	8.0	27	14.8	2.0	0	0.0	9.4	0	0.0	4.6	18.8
Middle	0	0.0	22.7	0	0.0	17.0	0	0.0	12.5	0	0.0	16.1	21.7
Upper	3	75.0	68.0	155	85.2	80.4	0	0.0	71.9	0	0.0	76.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	182	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	3.4	0	0.0	1.6	18.6
Moderate	0	0.0	21.9	0	0.0	8.6	0	0.0	13.8	0	0.0	9.5	18.8
Middle	0	0.0	12.5	0	0.0	13.5	0	0.0	17.2	0	0.0	9.4	21.7
Upper	0	0.0	53.1	0	0.0	59.8	0	0.0	62.1	0	0.0	77.5	40.9
Unknown	0	0.0	12.5	0	0.0	18.1	0	0.0	3.4	0	0.0	2.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	4.3	0	0.0	1.7	0	0.0	0.0	0	0.0	0.0	18.6
Moderate	0	0.0	4.3	0	0.0	7.9	0	0.0	0.0	0	0.0	0.0	18.8
Middle	0	0.0	4.3	0	0.0	5.6	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	4.3	0	0.0	8.1	0	0.0	3.1	0	0.0	0.0	40.9

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Newport-Lincoln City, OR

Unknown	0	0.0	82.6	0	0.0	76.6	0	0.0	96.9	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Newport-Lincoln City, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	10.0	5.8	20	8.2	3.7	9	12.7	6.6	413	8.4	6.2	9.0
Middle	6	60.0	73.6	149	61.1	74.9	50	70.4	75.4	3,052	62.2	75.3	73.9
Upper	3	30.0	13.7	75	30.7	15.9	12	16.9	15.6	1,442	29.4	16.7	17.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	7.0	0	0.0	5.5	0	0.0	2.4	0	0.0	1.8	
Total	10	100.0	100.0	244	100.0	100.0	71	100.0	100.0	4,907	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Newport-Lincoln City, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	5	50.0	54.2	93	38.1	48.2	2	2.8	46.7	113	2.3	31.7	95.0
Over $1 Million	1	10.0		38	15.6		4	5.6		1,098	22.4		4.0
Revenue Unknown	4	40.0		113	46.3		65	91.5		3,696	75.3		0.9
Total	10	100.0		244	100.0		71	100.0		4,907	100.0		100.0
By Loan Size													
$100,000 or Less	10	100.0	96.3	244	100.0	52.1	62	87.3	89.9	1,829	37.3	36.5	
$100,001 - $250,000	0	0.0	2.5	0	0.0	17.6	6	8.5	6.3	944	19.2	21.0	
$250,001 - $1 Million	0	0.0	1.1	0	0.0	30.3	3	4.2	3.8	2,134	43.5	42.5	
Total	10	100.0	100.0	244	100.0	100.0	71	100.0	100.0	4,907	100.0	100.0	

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Newport-Lincoln City, OR

By Loan Size and Revenues $1 Million or Less

$100,000 or Less	5	100.0		93	100.0		1	50.0		11	9.7		
$100,001 - $250,000	0	0.0		0	0.0		1	50.0		102	90.3		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	5	100.0		93	100.0		2	100.0		113	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Newport-Lincoln City, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.9	0	0.0	1.3	0	0.0	8.6	0	0.0	30.0	2.6
Middle	0	0.0	82.9	0	0.0	90.9	1	100.0	85.7	8	100.0	68.4	90.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	2.9	0	0.0	1.1	6.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	12.2	0	0.0	7.8	0	0.0	2.9	0	0.0	0.5	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	8	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Newport-Lincoln City, OR

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	61.0	0	0.0	56.0	1	100.0	62.9	8	100.0	33.0	94.9
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		4.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.9
Total	0	0.0		0	0.0		1	100.0		8	100.0		100.0

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Newport-Lincoln City, OR													
By Loan Size													
$100,000 or Less	0	0.0	100.0	0	0.0	100.0	1	100.0	85.7	8	100.0	36.6	
$100,001 - $250,000	0	0.0	0.0	0	0.0	0.0	0	0.0	11.4	0	0.0	37.5	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	2.9	0	0.0	25.9	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	8	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		1	100.0		8	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		8	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Newport-Lincoln City, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	3	75.0%	127	73.8%	1	25.0%	45	26.2%
Upper	1	25.0%	45	26.2%	3	75.0%	127	73.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	172	100.0%	4	100.0%	172	100.0%
	Other - Secured							

Low	0	0.0%	0	0.0%	1	33.3%	8	12.9%
Moderate	2	66.7%	54	87.1%	0	0.0%	0	0.0%
Low/Moderate Total	2	66.7%	54	87.1%	1	33.3%	8	12.9%
Middle	1	33.3%	8	12.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	66.7%	54	87.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	62	100.0%	3	100.0%	62	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	22.2%	49	27.7%	2	22.2%	14	7.9%
Low/Moderate Total	2	22.2%	49	27.7%	2	22.2%	14	7.9%
Middle	4	44.4%	102	57.6%	3	33.3%	55	31.1%
Upper	3	33.3%	26	14.7%	3	33.3%	93	52.5%
Unknown	0	0.0%	0	0.0%	1	11.1%	15	8.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	177	100.0%	9	100.0%	177	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	1	6.3%	8	1.9%
Moderate	4	25.0%	103	25.1%	2	12.5%	14	3.4%
Low/Moderate Total	4	25.0%	103	25.1%	3	18.8%	22	5.4%
Middle	8	50.0%	237	57.7%	4	25.0%	100	24.3%
Upper	4	25.0%	71	17.3%	8	50.0%	274	66.7%
Unknown	0	0.0%	0	0.0%	1	6.3%	15	3.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	411	100.0%	16	100.0%	411	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Newport-Lincoln City, OR

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	50.0%	11	44.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	11	44.0%

Middle	2	100.0%	25	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	14	56.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	25	100.0%	2	100.0%	25	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	25.0%	93	68.4%
Moderate	0	0.0%	0	0.0%	1	25.0%	4	2.9%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	97	71.3%
Middle	3	75.0%	132	97.1%	1	25.0%	7	5.1%
Upper	1	25.0%	4	2.9%	1	25.0%	32	23.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	136	100.0%	4	100.0%	136	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	4	36.4%	36	14.8%
Moderate	0	0.0%	0	0.0%	2	18.2%	40	16.5%
Low/Moderate Total	0	0.0%	0	0.0%	6	54.5%	76	31.3%
Middle	7	63.6%	207	85.2%	1	9.1%	30	12.3%
Upper	4	36.4%	36	14.8%	4	36.4%	137	56.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	243	100.0%	11	100.0%	243	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	6	35.3%	140	34.7%
Moderate	0	0.0%	0	0.0%	3	17.6%	44	10.9%
Low/Moderate Total	0	0.0%	0	0.0%	9	52.9%	184	45.5%
Middle	12	70.6%	364	90.1%	2	11.8%	37	9.2%
Upper	5	29.4%	40	9.9%	6	35.3%	183	45.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	404	100.0%	17	100.0%	404	100.0%

2020 Newport-Lincoln City, OR 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	2,322	18.6
Moderate	1	5.6	391	3.1	78	19.9	2,350	18.8
Middle	13	72.2	10,301	82.5	1,126	10.9	2,708	21.7
Upper	3	16.7	1,797	14.4	233	13.0	5,109	40.9
Unknown	1	5.6	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**12,489**	**100.0**	**1,437**	**11.5**	**12,489**	**100.0**

2020 Newport-Lincoln City, OR AA Demographics								
	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	1,284	261	2.0	20.3	660	51.4	363	28.3
Middle	24,293	11,104	84.6	45.7	5,563	22.9	7,626	31.4
Upper	5,126	1,760	13.4	34.3	1,218	23.8	2,148	41.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**30,703**	**13,125**	**100.0**	**42.7**	**7,441**	**24.2**	**10,137**	**33.0**

	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	261	9.0	250	9.1	10	8.5	1	3.7
Middle	2,147	73.9	2,038	73.8	84	71.8	25	92.6
Upper	496	17.1	472	17.1	23	19.7	1	3.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,904**	**100.0**	**2,760**	**100.0**	**117**	**100.0**	**27**	**100.0**
Percentage of Total Businesses:				**95.0**		**4.0**		**0.9**

	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	3	2.6	3	2.7	0	0.0	0	0.0
Middle	106	90.6	100	90.1	5	100.0	1	100.0
Upper	8	6.8	8	7.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**117**	**100.0**	**111**	**100.0**	**5**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**94.9**		**4.3**		**0.9**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	4.2	0.9	254	2.8	0.7	1	2.8	0.9	696	4.1	0.7	0.9
Moderate	1	4.2	19.3	131	1.5	16.0	1	2.8	19.1	269	1.6	16.0	18.4
Middle	11	45.8	46.9	2,976	33.3	44.8	19	52.8	47.0	7,389	43.7	44.9	47.2
Upper	11	45.8	32.9	5,589	62.4	38.4	15	41.7	33.0	8,538	50.5	38.3	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	8,950	100.0	100.0	36	100.0	100.0	16,892	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.8	0	0.0	0.6	1	1.5	0.7	171	0.8	0.6	0.9
Moderate	1	9.1	17.8	35	1.2	14.6	4	6.1	16.3	579	2.6	13.5	18.4
Middle	3	27.3	48.8	807	27.6	46.4	39	59.1	46.5	10,946	49.7	44.3	47.2
Upper	7	63.6	32.6	2,079	71.2	38.5	22	33.3	36.5	10,339	46.9	41.7	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	2,921	100.0	100.0	66	100.0	100.0	22,035	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.6	0	0.0	0.5	1	16.7	0.6	215	14.6	0.6	0.9
Moderate	5	23.8	16.7	372	14.8	13.5	0	0.0	15.8	0	0.0	13.3	18.4
Middle	9	42.9	47.2	1,013	40.3	44.2	0	0.0	45.5	0	0.0	43.0	47.2
Upper	7	33.3	35.4	1,129	44.9	41.8	5	83.3	38.1	1,259	85.4	43.2	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	2,514	100.0	100.0	6	100.0	100.0	1,474	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	3.9	0	0.0	1.6	0	0.0	3.4	0	0.0	3.0	4.4
Moderate	0	0.0	38.4	0	0.0	27.7	0	0.0	35.8	0	0.0	38.4	33.1
Middle	1	50.0	40.1	4,100	73.2	30.3	3	100.0	38.6	9,278	100.0	34.7	33.9
Upper	1	50.0	17.5	1,500	26.8	40.3	0	0.0	22.0	0	0.0	23.2	27.6
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.7	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	5,600	100.0	100.0	3	100.0	100.0	9,278	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	1.4	0.9	254	1.2	0.7	3	2.5	0.8	1,082	2.1	0.7	0.9
Moderate	9	12.3	18.4	660	3.1	16.2	6	5.0	17.1	923	1.8	15.2	18.4
Middle	32	43.8	47.7	9,687	45.7	44.2	64	53.8	46.5	27,979	55.1	44.0	47.2
Upper	31	42.5	33.0	10,617	50.0	38.9	46	38.7	35.6	20,811	41.0	40.0	33.5

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	73	100.0	100.0	21,218	100.0	100.0	119	100.0	100.0	50,795	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.8	0	0.0	0.6	0	0.0	0.7	0	0.0	0.4	0.9
Moderate	2	13.3	15.5	122	9.9	11.5	1	14.3	13.9	75	7.4	9.3	18.4
Middle	8	53.3	45.9	791	64.2	39.7	3	42.9	43.2	366	36.0	38.6	47.2
Upper	5	33.3	37.6	320	26.0	48.1	3	42.9	42.2	575	56.6	51.7	33.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	1,233	100.0	100.0	7	100.0	100.0	1,016	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.1	0	0.0	1.0	0	0.0	0.9	0	0.0	0.4	0.9
Moderate	0	0.0	17.1	0	0.0	11.0	0	0.0	15.9	0	0.0	11.3	18.4
Middle	0	0.0	47.2	0	0.0	41.3	0	0.0	43.8	0	0.0	34.5	47.2
Upper	0	0.0	34.6	0	0.0	46.6	1	100.0	39.3	100	100.0	53.8	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	1.5	0	0.0	1.0	0.9
Moderate	0	0.0	23.0	0	0.0	16.0	0	0.0	28.2	0	0.0	21.0	18.4
Middle	0	0.0	47.5	0	0.0	42.5	0	0.0	46.0	0	0.0	44.2	47.2
Upper	0	0.0	27.9	0	0.0	40.3	0	0.0	24.3	0	0.0	33.8	33.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.8	0	0.0	1.5	0	0.0	3.2	0	0.0	1.8	21.2
Moderate	2	8.3	17.0	317	3.5	12.9	2	5.6	18.4	619	3.7	14.7	17.2
Middle	2	8.3	25.6	474	5.3	23.6	8	22.2	27.1	3,547	21.0	25.6	20.4
Upper	18	75.0	41.9	7,445	83.2	50.0	25	69.4	42.3	12,457	73.7	49.1	41.2
Unknown	2	8.3	12.7	714	8.0	12.1	1	2.8	8.9	269	1.6	8.8	0.0
Total	24	100.0	100.0	8,950	100.0	100.0	36	100.0	100.0	16,892	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.1	0	0.0	3.1	4	6.1	4.2	524	2.4	2.5	21.2
Moderate	0	0.0	16.6	0	0.0	12.5	10	15.2	15.3	2,105	9.6	11.9	17.2
Middle	4	36.4	23.7	812	27.8	21.6	8	12.1	24.7	2,220	10.1	22.9	20.4
Upper	6	54.5	37.7	1,716	58.7	44.5	39	59.1	40.3	15,615	70.9	46.3	41.2
Unknown	1	9.1	16.9	393	13.5	18.4	5	7.6	15.4	1,571	7.1	16.4	0.0
Total	11	100.0	100.0	2,921	100.0	100.0	66	100.0	100.0	22,035	100.0	100.0	100.0
Home Improvement Loans													
Low	2	9.5	4.5	67	2.7	2.9	0	0.0	4.8	0	0.0	3.3	21.2
Moderate	3	14.3	15.5	143	5.7	12.9	0	0.0	15.8	0	0.0	13.8	17.2
Middle	3	14.3	26.9	425	16.9	23.6	0	0.0	26.8	0	0.0	25.4	20.4
Upper	13	61.9	50.7	1,879	74.7	57.3	6	100.0	50.9	1,474	100.0	55.5	41.2
Unknown	0	0.0	2.4	0	0.0	3.3	0	0.0	1.8	0	0.0	2.0	0.0
Total	21	100.0	100.0	2,514	100.0	100.0	6	100.0	100.0	1,474	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	2.8	4.1	67	0.4	2.3	4	3.4	4.0	524	1.3	2.3	21.2
Moderate	7	9.9	16.5	490	3.1	12.6	12	10.3	16.0	2,724	6.6	12.7	17.2
Middle	10	14.1	24.7	1,739	11.1	22.4	18	15.5	25.3	5,925	14.3	23.6	20.4
Upper	49	69.0	40.8	12,215	78.2	47.6	75	64.7	41.4	30,429	73.3	47.4	41.2
Unknown	3	4.2	13.9	1,107	7.1	15.1	7	6.0	13.4	1,915	4.6	14.0	0.0
Total	71	100.0	100.0	15,618	100.0	100.0	116	100.0	100.0	41,517	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	4.4	0	0.0	2.8	0	0.0	4.6	0	0.0	3.1	21.2
Moderate	2	13.3	15.0	30	2.4	9.5	0	0.0	12.4	0	0.0	7.8	17.2
Middle	1	6.7	27.0	28	2.3	21.5	2	28.6	23.8	158	15.6	18.0	20.4
Upper	12	80.0	51.1	1,175	95.3	63.8	4	57.1	56.7	783	77.1	68.6	41.2
Unknown	0	0.0	2.5	0	0.0	2.4	1	14.3	2.5	75	7.4	2.5	0.0
Total	15	100.0	100.0	1,233	100.0	100.0	7	100.0	100.0	1,016	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.0	0	0.0	4.8	0	0.0	7.1	0	0.0	3.9	21.2
Moderate	0	0.0	16.6	0	0.0	10.9	0	0.0	11.9	0	0.0	8.0	17.2
Middle	0	0.0	24.9	0	0.0	18.0	0	0.0	21.5	0	0.0	17.2	20.4
Upper	0	0.0	46.6	0	0.0	59.3	1	100.0	48.9	100	100.0	62.5	41.2
Unknown	0	0.0	4.9	0	0.0	7.0	0	0.0	10.6	0	0.0	8.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.7	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	21.2
Moderate	0	0.0	2.3	0	0.0	0.6	0	0.0	0.4	0	0.0	0.2	17.2
Middle	0	0.0	1.6	0	0.0	1.5	0	0.0	0.1	0	0.0	0.1	20.4
Upper	0	0.0	4.2	0	0.0	7.4	0	0.0	0.1	0	0.0	0.2	41.2
Unknown	0	0.0	90.2	0	0.0	90.5	0	0.0	99.2	0	0.0	99.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	3.0	2.5	84	0.6	4.0	24	4.7	2.9	2,949	4.9	4.4	2.6
Moderate	20	29.9	21.0	3,760	27.5	22.9	92	18.1	21.6	15,063	24.8	23.6	21.7
Middle	18	26.9	39.2	3,131	22.9	37.2	177	34.9	38.6	19,544	32.1	36.2	40.2
Upper	26	38.8	33.6	6,639	48.6	31.1	194	38.3	34.1	20,627	33.9	31.3	33.5
Unknown	1	1.5	1.6	60	0.4	3.2	20	3.9	1.9	2,611	4.3	3.7	2.0

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography													
Tract-Unk	0	0.0	2.2	0	0.0	1.5	0	0.0	0.9	0	0.0	0.8	
Total	67	100.0	100.0	13,674	100.0	100.0	507	100.0	100.0	60,794	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	17	25.4	51.5	2,904	21.2	30.1	28	5.5	43.9	3,624	6.0	23.9	93.2
Over $1 Million	50	74.6		10,770	78.8		39	7.7		8,957	14.7		6.1
Revenue Unknown	0	0.0		0	0.0		440	86.8		48,213	79.3		0.7
Total	67	100.0		13,674	100.0		507	100.0		60,794	100.0		100.0
By Loan Size													
$100,000 or Less	31	46.3	94.7	1,100	8.0	41.1	349	68.8	87.0	12,059	19.8	31.9	
$100,001 - $250,000	17	25.4	2.5	3,359	24.6	12.5	91	17.9	7.4	14,557	23.9	19.9	
$250,001 - $1 Million	19	28.4	2.8	9,215	67.4	46.4	67	13.2	5.6	34,178	56.2	48.2	
Total	67	100.0	100.0	13,674	100.0	100.0	507	100.0	100.0	60,794	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	10	58.8		304	10.5		22	78.6		812	22.4		
$100,001 - $250,000	3	17.6		750	25.8		2	7.1		400	11.0		
$250,001 - $1 Million	4	23.5		1,850	63.7		4	14.3		2,412	66.6		
Total	17	100.0		2,904	100.0		28	100.0		3,624	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.5	0	0.0	0.5	0	0.0	0.9	0	0.0	1.6	0.7
Moderate	0	0.0	5.9	0	0.0	4.9	0	0.0	6.8	0	0.0	4.8	9.2
Middle	0	0.0	57.9	0	0.0	57.4	0	0.0	55.8	0	0.0	55.3	55.4
Upper	0	0.0	32.7	0	0.0	35.9	0	0.0	34.9	0	0.0	37.4	34.3
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.2	0	0.0	0.0	0.4
Tract-Unk	0	0.0	2.9	0	0.0	1.4	0	0.0	1.4	0	0.0	0.8	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Portland-Vancouver-Salem OR-WA CSA

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	54.8	0	0.0	37.5	0	0.0	47.7	0	0.0	29.4	95.3
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		4.6
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.1
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	85.9	0	0.0	27.2	0	0.0	74.2	0	0.0	22.8	
$100,001 - $250,000	0	0.0	5.9	0	0.0	18.8	0	0.0	14.2	0	0.0	27.1	
$250,001 - $500,000	0	0.0	8.2	0	0.0	54.0	0	0.0	11.6	0	0.0	50.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Portland-Vancouver-Salem OR-WA CSA												
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0	
Total	0	0.0		0	0.0		0	0.0		0	0.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Portland-Vancouver-Salem OR-WA CSA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	3	23.1%	38	17.0%
Moderate	3	23.1%	43	19.2%	2	15.4%	29	12.9%
Low/Moderate Total	3	23.1%	43	19.2%	5	38.5%	67	29.9%
Middle	9	69.2%	175	78.1%	2	15.4%	69	30.8%
Upper	1	7.7%	6	2.7%	6	46.2%	88	39.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	224	100.0%	13	100.0%	224	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	16.7%	52	11.4%	2	11.1%	47	10.3%
Low/Moderate Total	3	16.7%	52	11.4%	2	11.1%	47	10.3%
Middle	10	55.6%	283	61.9%	3	16.7%	60	13.1%
Upper	5	27.8%	122	26.7%	13	72.2%	350	76.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	18	100.0%	457	100.0%	18	100.0%	457	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	7	17.5%	33	2.8%
Moderate	11	27.5%	142	12.1%	9	22.5%	137	11.7%

Low/Moderate Total	11	27.5%	142	12.1%	16	40.0%	170	14.5%
Middle	11	27.5%	263	22.4%	4	10.0%	96	8.2%
Upper	18	45.0%	768	65.5%	19	47.5%	894	76.2%
Unknown	0	0.0%	0	0.0%	1	2.5%	13	1.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	40	100.0%	1,173	100.0%	40	100.0%	1,173	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	10	14.1%	71	3.8%
Moderate	17	23.9%	237	12.8%	13	18.3%	213	11.5%
Low/Moderate Total	17	23.9%	237	12.8%	23	32.4%	284	15.3%
Middle	30	42.3%	721	38.9%	9	12.7%	225	12.1%
Upper	24	33.8%	896	48.3%	38	53.5%	1,332	71.8%
Unknown	0	0.0%	0	0.0%	1	1.4%	13	0.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	71	100.0%	1,854	100.0%	71	100.0%	1,854	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Portland-Vancouver-Salem OR-WA CSA

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	27.3%	110	37.8%	1	9.1%	26	8.9%
Low/Moderate Total	3	27.3%	110	37.8%	1	9.1%	26	8.9%
Middle	5	45.5%	114	39.2%	2	18.2%	61	21.0%
Upper	3	27.3%	67	23.0%	8	72.7%	204	70.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	291	100.0%	11	100.0%	291	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	3.7%	14	1.5%
Moderate	7	25.9%	179	19.8%	4	14.8%	108	11.9%
Low/Moderate Total	7	25.9%	179	19.8%	5	18.5%	122	13.5%
Middle	10	37.0%	324	35.8%	6	22.2%	157	17.3%
Upper	10	37.0%	403	44.5%	14	51.9%	547	60.4%

Unknown	0	0.0%	0	0.0%	2	7.4%	80	8.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	906	100.0%	27	100.0%	906	100.0%
	Other - Unsecured							
Low	1	2.9%	25	2.7%	7	20.0%	74	8.0%
Moderate	2	5.7%	110	11.9%	8	22.9%	232	25.1%
Low/Moderate Total	3	8.6%	135	14.6%	15	42.9%	306	33.0%
Middle	18	51.4%	269	29.0%	5	14.3%	128	13.8%
Upper	14	40.0%	522	56.4%	15	42.9%	492	53.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	926	100.0%	35	100.0%	926	100.0%
	Consumer Loan Totals							
Low	1	1.4%	25	1.2%	8	11.0%	88	4.1%
Moderate	12	16.4%	399	18.8%	13	17.8%	366	17.2%
Low/Moderate Total	13	17.8%	424	20.0%	21	28.8%	454	21.4%
Middle	33	45.2%	707	33.3%	13	17.8%	346	16.3%
Upper	27	37.0%	992	46.7%	37	50.7%	1,243	58.5%
Unknown	0	0.0%	0	0.0%	2	2.7%	80	3.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	73	100.0%	2,123	100.0%	73	100.0%	2,123	100.0%

2020 Portland-Vancouver-Salem OR-WA CSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	13	2.5	11,688	1.9	3,847	32.9	131,862	21.2
Moderate	126	23.8	144,267	23.1	26,690	18.5	107,504	17.2
Middle	235	44.4	281,650	45.2	22,806	8.1	126,847	20.4
Upper	152	28.7	185,535	29.8	7,808	4.2	257,109	41.2
Unknown	3	0.6	182	0.0	31	17.0	0	0.0
Total AA	**529**	**100.0**	**623,322**	**100.0**	**61,182**	**9.8**	**623,322**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	21,015	5,096	0.9	24.2	14,557	69.3	1,362	6.5
Moderate	251,290	107,400	18.4	42.7	128,387	51.1	15,503	6.2
Middle	457,469	275,879	47.2	60.3	155,102	33.9	26,488	5.8
Upper	298,362	196,092	33.5	65.7	87,029	29.2	15,241	5.1
Unknown	2,110	182	0.0	8.6	1,788	84.7	140	6.6
Total AA	**1,030,246**	**584,649**	**100.0**	**56.7**	**386,863**	**37.6**	**58,734**	**5.7**

2020 Portland-Vancouver-Salem OR-WA CSA AA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,021	2.6	3,485	2.4	498	5.2	38	3.2
Moderate	34,135	21.7	31,373	21.4	2,536	26.4	226	19.3
Middle	63,234	40.2	59,513	40.6	3,297	34.4	424	36.2
Upper	52,777	33.5	49,543	33.8	2,780	29.0	454	38.8
Unknown	3,146	2.0	2,639	1.8	478	5.0	29	2.5
Total AA	**157,313**	**100.0**	**146,553**	**100.0**	**9,589**	**100.0**	**1,171**	**100.0**
Percentage of Total Businesses:				**93.2**		**6.1**		**0.7**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	27	0.7	24	0.7	3	1.7	0	0.0
Moderate	354	9.2	344	9.4	10	5.6	0	0.0
Middle	2,135	55.4	2,035	55.4	100	55.9	0	0.0
Upper	1,321	34.3	1,254	34.2	65	36.3	2	100.0
Unknown	15	0.4	14	0.4	1	0.6	0	0.0
Total AA	**3,852**	**100.0**	**3,671**	**100.0**	**179**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**95.3**		**4.6**		**0.1**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Raymond-Westport, WA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	14.3	19.0	201	15.0	16.7	1	25.0	19.0	200	22.2	16.3	17.0
Middle	6	85.7	77.1	1,143	85.0	79.6	3	75.0	76.7	700	77.8	79.3	78.8
Upper	0	0.0	3.9	0	0.0	3.7	0	0.0	4.3	0	0.0	4.4	4.2

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Raymond-Westport, WA													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,344	100.0	100.0	4	100.0	100.0	900	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.3	0	0.0	11.8	0	0.0	15.3	0	0.0	13.1	17.0
Middle	2	100.0	81.3	291	100.0	84.0	5	100.0	80.6	669	100.0	83.4	78.8
Upper	0	0.0	4.4	0	0.0	4.2	0	0.0	4.1	0	0.0	3.5	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	291	100.0	100.0	5	100.0	100.0	669	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	18.1	0	0.0	22.6	0	0.0	14.8	0	0.0	21.5	17.0
Middle	3	100.0	76.8	80	100.0	73.5	2	100.0	79.1	275	100.0	74.8	78.8
Upper	0	0.0	5.2	0	0.0	4.0	0	0.0	6.1	0	0.0	3.7	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	80	100.0	100.0	2	100.0	100.0	275	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	28.6	0	0.0	6.2	0	0.0	25.0	0	0.0	14.4	31.2
Middle	0	0.0	71.4	0	0.0	93.8	0	0.0	75.0	0	0.0	85.6	61.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	7.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	11.1	17.4	440	19.3	14.9	1	8.3	16.9	200	10.6	14.5	17.0
Middle	16	88.9	78.6	1,844	80.7	81.3	11	91.7	78.7	1,694	89.4	81.5	78.8
Upper	0	0.0	4.0	0	0.0	3.8	0	0.0	4.4	0	0.0	3.9	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,284	100.0	100.0	12	100.0	100.0	1,894	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Raymond-Westport, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	16.7	14.2	239	42.0	17.4	0	0.0	15.3	0	0.0	9.8	17.0
Middle	5	83.3	83.0	330	58.0	81.2	1	100.0	77.6	50	100.0	81.6	78.8
Upper	0	0.0	2.8	0	0.0	1.4	0	0.0	7.1	0	0.0	8.6	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	569	100.0	100.0	1	100.0	100.0	50	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	21.1	0	0.0	19.3	0	0.0	16.7	0	0.0	14.8	17.0
Middle	0	0.0	77.6	0	0.0	79.6	0	0.0	77.3	0	0.0	83.1	78.8
Upper	0	0.0	1.3	0	0.0	1.1	0	0.0	6.1	0	0.0	2.1	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	28.1	0	0.0	27.3	0	0.0	15.6	0	0.0	12.0	17.0
Middle	0	0.0	68.8	0	0.0	72.6	0	0.0	75.0	0	0.0	76.6	78.8
Upper	0	0.0	3.1	0	0.0	0.0	0	0.0	9.4	0	0.0	11.4	4.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Raymond-Westport, WA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.9	0	0.0	2.8	0	0.0	3.9	0	0.0	2.4	21.4
Moderate	1	14.3	16.0	246	18.3	11.6	1	25.0	17.4	100	11.1	13.1	22.1
Middle	2	28.6	23.2	449	33.4	21.1	1	25.0	23.4	200	22.2	22.0	21.6

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Raymond-Westport, WA													
Upper	3	42.9	37.7	377	28.1	47.0	2	50.0	46.4	600	66.7	53.6	34.9
Unknown	1	14.3	18.2	272	20.2	17.5	0	0.0	9.0	0	0.0	8.9	0.0
Total	7	100.0	100.0	1,344	100.0	100.0	4	100.0	100.0	900	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.1	0	0.0	4.2	0	0.0	4.6	0	0.0	2.4	21.4
Moderate	0	0.0	12.7	0	0.0	9.4	2	40.0	11.8	295	44.1	8.7	22.1
Middle	1	50.0	20.3	75	25.8	17.9	1	20.0	19.7	158	23.6	17.2	21.6
Upper	1	50.0	37.7	216	74.2	42.4	1	20.0	41.1	50	7.5	47.4	34.9
Unknown	0	0.0	22.3	0	0.0	26.1	1	20.0	22.8	166	24.8	24.3	0.0
Total	2	100.0	100.0	291	100.0	100.0	5	100.0	100.0	669	100.0	100.0	100.0
Home Improvement Loans													
Low	1	33.3	7.7	10	12.5	6.5	0	0.0	7.0	0	0.0	2.9	21.4
Moderate	0	0.0	18.7	0	0.0	16.6	0	0.0	13.0	0	0.0	10.7	22.1
Middle	0	0.0	25.8	0	0.0	22.7	1	50.0	22.6	125	45.5	19.4	21.6
Upper	1	33.3	43.9	20	25.0	48.0	1	50.0	53.0	150	54.5	58.6	34.9
Unknown	1	33.3	3.9	50	62.5	6.2	0	0.0	4.3	0	0.0	8.5	0.0
Total	3	100.0	100.0	80	100.0	100.0	2	100.0	100.0	275	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	16.7	5.9	160	7.0	3.4	0	0.0	4.3	0	0.0	2.4	21.4
Moderate	1	5.6	14.7	246	10.8	10.8	3	25.0	14.2	395	20.9	10.6	22.1
Middle	4	22.2	21.9	574	25.1	19.8	3	25.0	21.2	483	25.5	19.1	21.6
Upper	8	44.4	38.6	982	43.0	45.5	5	41.7	43.6	850	44.9	50.3	34.9
Unknown	2	11.1	18.9	322	14.1	20.5	1	8.3	16.7	166	8.8	17.6	0.0
Total	18	100.0	100.0	2,284	100.0	100.0	12	100.0	100.0	1,894	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Raymond-Westport, WA													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC													
Low	2	33.3	9.4	150	26.4	7.1	0	0.0	6.1	0	0.0	2.4	21.4
Moderate	0	0.0	11.3	0	0.0	6.9	0	0.0	12.2	0	0.0	9.0	22.1
Middle	1	16.7	20.8	50	8.8	21.6	0	0.0	25.5	0	0.0	20.3	21.6
Upper	3	50.0	57.5	369	64.9	64.0	1	100.0	55.1	50	100.0	67.7	34.9
Unknown	0	0.0	0.9	0	0.0	0.4	0	0.0	1.0	0	0.0	0.6	0.0
Total	6	100.0	100.0	569	100.0	100.0	1	100.0	100.0	50	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Raymond-Westport, WA

Other Purpose Closed/Exempt													
Low	0	0.0	10.5	0	0.0	6.9	0	0.0	6.1	0	0.0	3.6	21.4
Moderate	0	0.0	14.5	0	0.0	8.5	0	0.0	13.6	0	0.0	6.6	22.1
Middle	0	0.0	15.8	0	0.0	15.0	0	0.0	15.2	0	0.0	8.8	21.6
Upper	0	0.0	59.2	0	0.0	69.5	0	0.0	60.6	0	0.0	77.9	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.5	0	0.0	3.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.4
Moderate	0	0.0	3.1	0	0.0	2.3	0	0.0	1.6	0	0.0	2.1	22.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	1.6	0	0.0	0.0	21.6
Upper	0	0.0	6.3	0	0.0	9.4	0	0.0	0.0	0	0.0	0.0	34.9
Unknown	0	0.0	90.6	0	0.0	88.4	0	0.0	96.9	0	0.0	97.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Raymond-Westport, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	24.7	10	23.3	23.9	11	21.6	26.7	474	18.5	28.9	26.2
Middle	2	66.7	66.8	33	76.7	64.8	40	78.4	67.5	2,087	81.5	65.6	70.8
Upper	0	0.0	2.7	0	0.0	5.4	0	0.0	2.4	0	0.0	2.1	3.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	5.8	0	0.0	6.0	0	0.0	3.4	0	0.0	3.4	
Total	3	100.0	100.0	43	100.0	100.0	51	100.0	100.0	2,561	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Raymond-Westport, WA

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	33.3	48.6	8	18.6	38.2	2	3.9	37.1	45	1.8	26.2	92.1
Over $1 Million	2	66.7		35	81.4		1	2.0		15	0.6		6.0
Revenue Unknown	0	0.0		0	0.0		48	94.1		2,501	97.7		1.9
Total	3	100.0		43	100.0		51	100.0		2,561	100.0		100.0
By Loan Size													
$100,000 or Less	3	100.0	96.4	43	100.0	50.1	45	88.2	93.1	1,114	43.5	49.3	
$100,001 - $250,000	0	0.0	2.1	0	0.0	16.9	4	7.8	5.0	656	25.6	20.0	
$250,001 - $1 Million	0	0.0	1.6	0	0.0	33.0	2	3.9	2.0	791	30.9	30.7	
Total	3	100.0	100.0	43	100.0	100.0	51	100.0	100.0	2,561	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		8	100.0		2	100.0		45	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		8	100.0		2	100.0		45	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Raymond-Westport, WA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.6	0	0.0	10.4	0	0.0	20.5	0	0.0	31.0	10.0
Middle	1	100.0	83.1	25	100.0	89.0	0	0.0	79.5	0	0.0	69.0	88.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Raymond-Westport, WA

Tract-Unk	0	0.0	3.4	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	25	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Raymond-Westport, WA

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	100.0	47.5	25	100.0	35.6	0	0.0	34.1	0	0.0	25.4	95.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	1	100.0		25	100.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	1	100.0	93.2	25	100.0	56.2	0	0.0	75.0	0	0.0	21.9	
$100,001 - $250,000	0	0.0	5.1	0	0.0	27.2	0	0.0	15.9	0	0.0	34.1	
$250,001 - $500,000	0	0.0	1.7	0	0.0	16.6	0	0.0	9.1	0	0.0	43.9	
Total	1	100.0	100.0	25	100.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		25	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		25	100.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Raymond-Westport, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	17	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	17	100.0%
Middle	1	100.0%	17	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	17	100.0%	1	100.0%	17	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	16.7%	8	6.5%
Moderate	2	33.3%	49	39.5%	2	33.3%	17	13.7%
Low/Moderate Total	2	33.3%	49	39.5%	3	50.0%	25	20.2%
Middle	4	66.7%	75	60.5%	2	33.3%	79	63.7%
Upper	0	0.0%	0	0.0%	1	16.7%	20	16.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	124	100.0%	6	100.0%	124	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	6	37.5%	29	17.4%
Moderate	3	18.8%	32	19.2%	5	31.3%	40	24.0%
Low/Moderate Total	3	18.8%	32	19.2%	11	68.8%	69	41.3%
Middle	13	81.3%	135	80.8%	2	12.5%	30	18.0%
Upper	0	0.0%	0	0.0%	3	18.8%	68	40.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	167	100.0%	16	100.0%	167	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	7	30.4%	37	12.0%
Moderate	5	21.7%	81	26.3%	8	34.8%	74	24.0%
Low/Moderate Total	5	21.7%	81	26.3%	15	65.2%	111	36.0%

Middle	18	78.3%	227	73.7%	4	17.4%	109	35.4%
Upper	0	0.0%	0	0.0%	4	17.4%	88	28.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	308	100.0%	23	100.0%	308	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Raymond-Westport, WA

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	17	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	17	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	17	100.0%	1	100.0%	17	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	12	100.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	100.0%	12	100.0%
Middle	1	100.0%	12	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	12	100.0%	1	100.0%	12	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	3	25.0%	10	6.8%
Moderate	2	16.7%	43	29.3%	2	16.7%	16	10.9%
Low/Moderate Total	2	16.7%	43	29.3%	5	41.7%	26	17.7%
Middle	10	83.3%	104	70.7%	3	25.0%	43	29.3%
Upper	0	0.0%	0	0.0%	3	25.0%	68	46.3%
Unknown	0	0.0%	0	0.0%	1	8.3%	10	6.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	12	100.0%	147	100.0%	12	100.0%	147	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	3	21.4%	10	5.7%
Moderate	2	14.3%	43	24.4%	3	21.4%	28	15.9%
Low/Moderate Total	2	14.3%	43	24.4%	6	42.9%	38	21.6%

Middle	12	85.7%	133	75.6%	3	21.4%	43	24.4%
Upper	0	0.0%	0	0.0%	4	28.6%	85	48.3%
Unknown	0	0.0%	0	0.0%	1	7.1%	10	5.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	176	100.0%	14	100.0%	176	100.0%

2020 Raymond-Westport, WA 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	5,152	21.4
Moderate	7	26.9	4,377	18.2	781	17.8	5,311	22.1
Middle	16	61.5	18,751	77.9	1,896	10.1	5,206	21.6
Upper	1	3.8	951	3.9	52	5.5	8,410	34.9
Unknown	2	7.7	0	0.0	0	0.0	0	0.0
Total AA	**26**	**100.0**	**24,079**	**100.0**	**2,729**	**11.3**	**24,079**	**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	12,323	4,481	17.0	36.4	3,114	25.3	4,728	38.4
Middle	38,799	20,793	78.8	53.6	7,956	20.5	10,050	25.9
Upper	1,894	1,104	4.2	58.3	587	31.0	203	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**53,016**	**26,378**	**100.0**	**49.8**	**11,657**	**22.0**	**14,981**	**28.3**

	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	1,013	26.2	917	25.7	82	35.2	14	19.4
Middle	2,738	70.8	2,540	71.3	142	60.9	56	77.8
Upper	118	3.0	107	3.0	9	3.9	2	2.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,869**	**100.0**	**3,564**	**100.0**	**233**	**100.0**	**72**	**100.0**
Percentage of Total Businesses:				**92.1**		**6.0**		**1.9**

	Total Farms by Tract	**Farms by Tract & Revenue Size**		
		Less Than or = $1 Million	**Over $1 Million**	**Revenue Not Reported**

2020 Raymond-Westport, WA AA Demographics								
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	26	10.0	25	10.1	1	7.7	0	0.0
Middle	230	88.5	218	88.3	12	92.3	0	0.0
Upper	4	1.5	4	1.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**260**	**100.0**	**247**	**100.0**	**13**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.0**		**5.0**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Riverton, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	12	20.0	18.1	1,531	13.3	14.4	7	13.5	14.1	986	10.6	10.3	19.5
Middle	48	80.0	81.9	9,990	86.7	85.6	45	86.5	85.9	8,330	89.4	89.7	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	60	100.0	100.0	11,521	100.0	100.0	52	100.0	100.0	9,316	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	9.4	9.9	594	6.2	9.0	18	13.7	11.4	2,756	11.0	8.9	19.5
Middle	58	90.6	90.1	8,935	93.8	91.0	113	86.3	88.6	22,247	89.0	91.1	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	9,529	100.0	100.0	131	100.0	100.0	25,003	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.8	0	0.0	6.8	2	14.3	15.8	150	12.8	13.1	19.5
Middle	9	100.0	95.2	515	100.0	93.2	12	85.7	84.2	1,024	87.2	86.9	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Riverton, WY													
Total	9	100.0	100.0	515	100.0	100.0	14	100.0	100.0	1,174	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	100.0	100.0	438	100.0	100.0	14.5
Middle	2	100.0	100.0	136	100.0	100.0	0	0.0	0.0	0	0.0	0.0	85.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	136	100.0	100.0	1	100.0	100.0	438	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	20	13.4	13.8	2,235	9.9	11.8	31	14.6	13.1	4,435	12.0	10.1	19.5
Middle	129	86.6	86.2	20,444	90.1	88.2	181	85.4	86.9	32,461	88.0	89.9	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	22,679	100.0	100.0	212	100.0	100.0	36,896	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Riverton, WY													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	16.7	10.0	110	11.7	5.9	3	21.4	20.0	105	10.9	20.9	19.5
Middle	10	83.3	90.0	833	88.3	94.1	11	78.6	80.0	860	89.1	79.1	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	943	100.0	100.0	14	100.0	100.0	965	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.0	0	0.0	16.8	0	0.0	0.0	0	0.0	0.0	19.5
Middle	2	100.0	90.0	35	100.0	83.2	0	0.0	100.0	0	0.0	100.0	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Riverton, WY													
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	35	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.7	0	0.0	4.3	0	0.0	30.0	0	0.0	32.0	19.5
Middle	0	0.0	92.3	0	0.0	95.7	0	0.0	70.0	0	0.0	68.0	80.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Riverton, WY													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	6	10.0	9.3	682	5.9	5.8	6	11.5	7.5	643	6.9	4.2	23.9
Moderate	18	30.0	26.4	2,511	21.8	22.7	18	34.6	24.1	3,185	34.2	19.2	20.5
Middle	15	25.0	21.6	3,059	26.6	22.6	10	19.2	18.1	1,958	21.0	18.9	22.4
Upper	20	33.3	22.4	5,231	45.4	29.7	14	26.9	28.5	3,114	33.4	39.4	33.1
Unknown	1	1.7	20.4	38	0.3	19.1	4	7.7	21.9	416	4.5	18.3	0.0
Total	60	100.0	100.0	11,521	100.0	100.0	52	100.0	100.0	9,316	100.0	100.0	100.0
Refinance Loans													
Low	9	14.1	13.0	711	7.5	8.7	12	9.2	6.7	1,527	6.1	4.2	23.9
Moderate	11	17.2	18.4	1,046	11.0	15.0	18	13.7	17.7	2,446	9.8	14.1	20.5
Middle	14	21.9	21.1	2,327	24.4	19.3	42	32.1	20.7	7,255	29.0	19.0	22.4
Upper	23	35.9	25.9	4,280	44.9	31.7	54	41.2	30.2	12,856	51.4	36.2	33.1
Unknown	7	10.9	21.7	1,165	12.2	25.3	5	3.8	24.6	919	3.7	26.5	0.0
Total	64	100.0	100.0	9,529	100.0	100.0	131	100.0	100.0	25,003	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	14.3	0	0.0	11.4	1	7.1	10.5	45	3.8	5.1	23.9
Moderate	2	22.2	14.3	60	11.7	6.8	5	35.7	26.3	402	34.2	27.5	20.5
Middle	1	11.1	28.6	50	9.7	28.1	5	35.7	36.8	598	50.9	53.5	22.4
Upper	5	55.6	38.1	390	75.7	52.8	3	21.4	26.3	129	11.0	13.9	33.1
Unknown	1	11.1	4.8	15	2.9	0.9	0	0.0	0.0	0	0.0	0.0	0.0
Total	9	100.0	100.0	515	100.0	100.0	14	100.0	100.0	1,174	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Riverton, WY

Total Home Mortgage Loans													
Low	16	10.9	10.8	1,448	6.4	7.1	21	10.0	6.9	2,357	6.5	4.2	23.9
Moderate	33	22.4	21.8	3,652	16.2	18.7	46	21.8	20.1	6,180	17.0	16.0	20.5
Middle	36	24.5	21.4	5,704	25.3	20.8	61	28.9	19.5	10,416	28.6	19.0	22.4
Upper	52	35.4	24.8	10,471	46.4	31.2	74	35.1	28.7	16,170	44.4	36.7	33.1
Unknown	10	6.8	21.2	1,268	5.6	22.3	9	4.3	24.7	1,335	3.7	24.2	0.0
Total	147	100.0	100.0	22,543	100.0	100.0	211	100.0	100.0	36,458	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Riverton, WY

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	1	8.3	10.0	55	5.8	4.3	2	14.3	10.0	142	14.7	10.6	23.9
Moderate	0	0.0	0.0	0	0.0	0.0	5	35.7	35.0	147	15.2	13.8	20.5
Middle	6	50.0	30.0	268	28.4	14.3	4	28.6	25.0	605	62.7	48.8	22.4
Upper	4	33.3	55.0	570	60.4	78.8	3	21.4	30.0	71	7.4	26.8	33.1
Unknown	1	8.3	5.0	50	5.3	2.7	0	0.0	0.0	0	0.0	0.0	0.0
Total	12	100.0	100.0	943	100.0	100.0	14	100.0	100.0	965	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	10.0	0	0.0	16.8	0	0.0	0.0	0	0.0	0.0	23.9
Moderate	2	100.0	40.0	35	100.0	17.8	0	0.0	28.6	0	0.0	21.4	20.5
Middle	0	0.0	20.0	0	0.0	14.8	0	0.0	14.3	0	0.0	10.4	22.4
Upper	0	0.0	30.0	0	0.0	50.5	0	0.0	28.6	0	0.0	48.0	33.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	28.6	0	0.0	20.2	0.0
Total	2	100.0	100.0	35	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	33.1
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Riverton, WY

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	23	16.1	10.0	1,050	7.3	11.0	55	16.0	11.3	6,138	22.9	21.4	13.5
Middle	120	83.9	82.8	13,243	92.7	84.3	289	84.0	83.8	20,722	77.1	75.9	86.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	7.2	0	0.0	4.6	0	0.0	4.8	0	0.0	2.7	
Total	143	100.0	100.0	14,293	100.0	100.0	344	100.0	100.0	26,860	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Riverton, WY

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	91	63.6	51.5	7,829	54.8	47.8	88	25.6	51.3	6,175	23.0	40.2	90.6
Over $1 Million	37	25.9		5,913	41.4		31	9.0		7,067	26.3		7.8
Revenue Unknown	15	10.5		551	3.9		225	65.4		13,618	50.7		1.6
Total	143	100.0		14,293	100.0		344	100.0		26,860	100.0		100.0
By Loan Size													
$100,000 or Less	112	78.3	94.1	4,085	28.6	46.4	290	84.3	89.7	8,895	33.1	35.1	
$100,001 - $250,000	16	11.2	3.0	2,990	20.9	14.5	29	8.4	5.0	4,631	17.2	15.5	
$250,001 - $1 Million	15	10.5	2.9	7,218	50.5	39.1	25	7.3	5.3	13,334	49.6	49.4	
Total	143	100.0	100.0	14,293	100.0	100.0	344	100.0	100.0	26,860	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	71	78.0		1,991	25.4		72	81.8		2,708	43.9		
$100,001 - $250,000	12	13.2		2,273	29.0		13	14.8		2,182	35.3		

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: Riverton, WY													
$250,001 - $1 Million	8	8.8		3,565	45.5		3	3.4		1,285	20.8		
Total	91	100.0		7,829	100.0		88	100.0		6,175	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Riverton, WY													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	39	20.0	16.8	3,118	19.5	17.0	24	19.5	15.6	1,538	16.0	13.3	9.7
Middle	156	80.0	81.6	12,834	80.5	82.1	99	80.5	82.6	8,072	84.0	85.2	90.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.6	0	0.0	0.9	0	0.0	1.8	0	0.0	1.4	
Total	195	100.0	100.0	15,952	100.0	100.0	123	100.0	100.0	9,610	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Riverton, WY

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

	Motor Vehicle							
Low	0	0.0%	0	0.0%	12	10.3%	213	6.0%
Moderate	27	23.3%	936	26.3%	19	16.4%	522	14.7%
Low/Moderate Total	27	23.3%	936	26.3%	31	26.7%	735	20.6%
Middle	89	76.7%	2,625	73.7%	33	28.4%	965	27.1%
Upper	0	0.0%	0	0.0%	52	44.8%	1,861	52.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	116	100.0%	3,561	100.0%	116	100.0%	3,561	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	15	21.4%	117	10.0%
Moderate	13	18.6%	164	14.1%	13	18.6%	205	17.6%
Low/Moderate Total	13	18.6%	164	14.1%	28	40.0%	322	27.6%
Middle	57	81.4%	1,003	85.9%	14	20.0%	276	23.7%
Upper	0	0.0%	0	0.0%	25	35.7%	494	42.3%
Unknown	0	0.0%	0	0.0%	3	4.3%	75	6.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	1,167	100.0%	70	100.0%	1,167	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	23	27.1%	164	19.7%
Moderate	25	29.4%	233	28.0%	29	34.1%	275	33.1%
Low/Moderate Total	25	29.4%	233	28.0%	52	61.2%	439	52.8%
Middle	60	70.6%	599	72.0%	14	16.5%	118	14.2%
Upper	0	0.0%	0	0.0%	18	21.2%	259	31.1%
Unknown	0	0.0%	0	0.0%	1	1.2%	16	1.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	85	100.0%	832	100.0%	85	100.0%	832	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	50	18.5%	494	8.9%
Moderate	65	24.0%	1,333	24.0%	61	22.5%	1,002	18.0%
Low/Moderate Total	65	24.0%	1,333	24.0%	111	41.0%	1,496	26.9%
Middle	206	76.0%	4,227	76.0%	61	22.5%	1,359	24.4%
Upper	0	0.0%	0	0.0%	95	35.1%	2,614	47.0%
Unknown	0	0.0%	0	0.0%	4	1.5%	91	1.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	271	100.0%	5,560	100.0%	271	100.0%	5,560	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Riverton, WY

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	16	15.5%	332	11.4%
Moderate	22	21.4%	694	23.9%	23	22.3%	514	17.7%
Low/Moderate Total	22	21.4%	694	23.9%	39	37.9%	846	29.1%
Middle	81	78.6%	2,215	76.1%	27	26.2%	810	27.8%
Upper	0	0.0%	0	0.0%	37	35.9%	1,253	43.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	103	100.0%	2,909	100.0%	103	100.0%	2,909	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	5	9.3%	49	5.1%
Moderate	8	14.8%	164	17.2%	11	20.4%	172	18.0%
Low/Moderate Total	8	14.8%	164	17.2%	16	29.6%	221	23.1%
Middle	46	85.2%	791	82.8%	13	24.1%	176	18.4%
Upper	0	0.0%	0	0.0%	24	44.4%	520	54.5%
Unknown	0	0.0%	0	0.0%	1	1.9%	38	4.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	54	100.0%	955	100.0%	54	100.0%	955	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	11	25.0%	55	10.0%
Moderate	7	15.9%	79	14.3%	12	27.3%	110	19.9%
Low/Moderate Total	7	15.9%	79	14.3%	23	52.3%	165	29.9%
Middle	37	84.1%	473	85.7%	8	18.2%	105	19.0%
Upper	0	0.0%	0	0.0%	9	20.5%	122	22.1%
Unknown	0	0.0%	0	0.0%	4	9.1%	160	29.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	44	100.0%	552	100.0%	44	100.0%	552	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	32	15.9%	436	9.9%
Moderate	37	18.4%	937	21.2%	46	22.9%	796	18.0%
Low/Moderate Total	37	18.4%	937	21.2%	78	38.8%	1,232	27.9%
Middle	164	81.6%	3,479	78.8%	48	23.9%	1,091	24.7%
Upper	0	0.0%	0	0.0%	70	34.8%	1,895	42.9%
Unknown	0	0.0%	0	0.0%	5	2.5%	198	4.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	201	100.0%	4,416	100.0%	201	100.0%	4,416	100.0%

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Riverton, WY													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	189	96.9	86.7	15,815	99.1	89.9	107	87.0	76.6	9,190	95.6	88.3	98.7
Over $1 Million	0	0.0		0	0.0		5	4.1		130	1.4		1.3
Revenue Unknown	6	3.1		137	0.9		11	8.9		290	3.0		0.0
Total	195	100.0		15,952	100.0		123	100.0		9,610	100.0		100.0
By Loan Size													
$100,000 or Less	151	77.4	80.5	5,720	35.9	38.7	98	79.7	83.2	3,924	40.8	44.7	
$100,001 - $250,000	29	14.9	12.9	5,017	31.5	29.7	16	13.0	10.8	2,739	28.5	26.5	
$250,001 - $500,000	15	7.7	6.6	5,215	32.7	31.5	9	7.3	6.0	2,947	30.7	28.8	
Total	195	100.0	100.0	15,952	100.0	100.0	123	100.0	100.0	9,610	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	145	76.7		5,583	35.3		82	76.6		3,504	38.1		
$100,001 - $250,000	29	15.3		5,017	31.7		16	15.0		2,739	29.8		
$250,001 - $500,000	15	7.9		5,215	33.0		9	8.4		2,947	32.1		
Total	189	100.0		15,815	100.0		107	100.0		9,190	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2020 Riverton, WY 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	2,423	23.9
Moderate	2	20.0	2,142	21.2	308	14.4	2,077	20.5
Middle	8	80.0	7,976	78.8	701	8.8	2,271	22.4
Upper	0	0.0	0	0.0	0	0.0	3,347	33.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**10**	**100.0**	**10,118**	**100.0**	**1,009**	**10.0**	**10,118**	**100.0**

2020 Riverton, WY AA Demographics								
	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	3,513	2,117	19.5	60.3	1,068	30.4	328	9.3
Middle	14,210	8,758	80.5	61.6	3,387	23.8	2,065	14.5
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**17,723**	**10,875**	**100.0**	**61.4**	**4,455**	**25.1**	**2,393**	**13.5**

	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	260	13.5	226	12.9	27	17.9	7	22.6
Middle	1,669	86.5	1,521	87.1	124	82.1	24	77.4
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,929**	**100.0**	**1,747**	**100.0**	**151**	**100.0**	**31**	**100.0**
Percentage of Total Businesses:				**90.6**		**7.8**		**1.6**

	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	15	9.7	15	9.8	0	0.0	0	0.0
Middle	140	90.3	138	90.2	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**155**	**100.0**	**153**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.7**		**1.3**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Seaside, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	76.6	0	0.0	75.9	0	0.0	78.4	0	0.0	78.1	69.9
Upper	0	0.0	23.4	0	0.0	24.1	0	0.0	21.6	0	0.0	21.9	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	72.3	0	0.0	72.1	1	100.0	73.5	136	100.0	72.8	69.9
Upper	0	0.0	27.7	0	0.0	27.9	0	0.0	26.5	0	0.0	27.2	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	136	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	74.1	245	100.0	71.0	3	75.0	75.8	224	84.8	85.3	69.9
Upper	0	0.0	25.9	0	0.0	29.0	1	25.0	24.2	40	15.2	14.7	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	245	100.0	100.0	4	100.0	100.0	264	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	90.0	0	0.0	82.9	97.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	10.0	0	0.0	17.1	2.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	100.0	74.6	405	100.0	74.6	4	80.0	75.3	360	90.0	75.1	69.9
Upper	0	0.0	25.4	0	0.0	25.4	1	20.0	24.7	40	10.0	24.9	30.1

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Seaside, OR													
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	405	100.0	100.0	5	100.0	100.0	400	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Seaside, OR													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	77.8	160	100.0	73.9	0	0.0	83.3	0	0.0	89.5	69.9
Upper	0	0.0	22.2	0	0.0	26.1	0	0.0	16.7	0	0.0	10.5	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	160	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	74.3	0	0.0	76.2	0	0.0	77.8	0	0.0	75.6	69.9
Upper	0	0.0	25.7	0	0.0	23.8	0	0.0	22.2	0	0.0	24.4	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	66.7	0	0.0	62.1	0	0.0	55.6	0	0.0	59.2	69.9
Upper	0	0.0	33.3	0	0.0	37.9	0	0.0	44.4	0	0.0	40.8	30.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Seaside, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	1.2	0	0.0	0.5	18.0
Moderate	0	0.0	6.1	0	0.0	4.0	0	0.0	7.4	0	0.0	4.6	16.8
Middle	0	0.0	16.5	0	0.0	13.8	0	0.0	21.3	0	0.0	17.4	17.9
Upper	0	0.0	63.0	0	0.0	68.9	0	0.0	58.8	0	0.0	66.2	47.3
Unknown	0	0.0	13.3	0	0.0	12.6	0	0.0	11.3	0	0.0	11.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	1.7	0	0.0	2.2	0	0.0	1.4	18.0
Moderate	0	0.0	9.1	0	0.0	5.8	1	100.0	7.5	136	100.0	4.9	16.8
Middle	0	0.0	18.1	0	0.0	14.3	0	0.0	16.3	0	0.0	13.6	17.9
Upper	0	0.0	50.2	0	0.0	56.2	0	0.0	51.5	0	0.0	56.1	47.3
Unknown	0	0.0	20.8	0	0.0	22.0	0	0.0	22.5	0	0.0	24.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	136	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.5	0	0.0	10.8	0	0.0	0.0	0	0.0	0.0	18.0
Moderate	3	100.0	17.3	245	100.0	7.5	1	25.0	6.1	20	7.6	2.7	16.8
Middle	0	0.0	16.0	0	0.0	10.3	0	0.0	21.2	0	0.0	15.3	17.9
Upper	0	0.0	58.0	0	0.0	60.3	3	75.0	69.7	244	92.4	76.4	47.3
Unknown	0	0.0	6.2	0	0.0	11.1	0	0.0	3.0	0	0.0	5.6	0.0
Total	3	100.0	100.0	245	100.0	100.0	4	100.0	100.0	264	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.5	0	0.0	1.3	0	0.0	1.8	0	0.0	1.0	18.0
Moderate	3	60.0	7.9	245	60.5	4.9	2	40.0	7.3	156	39.0	4.8	16.8
Middle	1	20.0	17.0	50	12.3	13.8	0	0.0	18.0	0	0.0	15.0	17.9
Upper	1	20.0	57.0	110	27.2	62.6	3	60.0	54.4	244	61.0	60.2	47.3
Unknown	0	0.0	16.7	0	0.0	17.5	0	0.0	18.5	0	0.0	19.0	0.0
Total	5	100.0	100.0	405	100.0	100.0	5	100.0	100.0	400	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Seaside, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.8	0	0.0	0.6	18.0
Moderate	0	0.0	8.3	0	0.0	4.5	0	0.0	0.0	0	0.0	0.0	16.8
Middle	1	50.0	22.2	50	31.3	12.0	0	0.0	16.7	0	0.0	8.7	17.9
Upper	1	50.0	63.9	110	68.8	75.5	0	0.0	75.0	0	0.0	86.5	47.3
Unknown	0	0.0	5.6	0	0.0	8.0	0	0.0	5.6	0	0.0	4.2	0.0
Total	2	100.0	100.0	160	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	3.7	0	0.0	3.4	18.0
Moderate	0	0.0	5.7	0	0.0	4.7	0	0.0	11.1	0	0.0	12.2	16.8
Middle	0	0.0	8.6	0	0.0	9.6	0	0.0	22.2	0	0.0	16.6	17.9
Upper	0	0.0	80.0	0	0.0	76.2	0	0.0	59.3	0	0.0	67.0	47.3
Unknown	0	0.0	5.7	0	0.0	9.5	0	0.0	3.7	0	0.0	0.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	47.3
Unknown	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Seaside, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	100.0	80.2	1,222	100.0	84.4	39	97.5	83.1	1,242	99.4	81.0	83.8
Upper	0	0.0	16.0	0	0.0	11.8	1	2.5	14.5	8	0.6	16.9	16.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Seaside, OR

Tract-Unk	0	0.0	3.8	0	0.0	3.8	0	0.0	2.4	0	0.0	2.2	
Total	6	100.0	100.0	1,222	100.0	100.0	40	100.0	100.0	1,250	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Seaside, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	5	83.3	61.2	1,122	91.8	43.3	12	30.0	55.1	440	35.2	23.5	94.3
Over $1 Million	1	16.7		100	8.2		4	10.0		95	7.6		4.7
Revenue Unknown	0	0.0		0	0.0		24	60.0		715	57.2		1.0
Total	6	100.0		1,222	100.0		40	100.0		1,250	100.0		100.0
By Loan Size													
$100,000 or Less	4	66.7	95.3	145	11.9	43.8	39	97.5	88.7	1,100	88.0	33.6	
$100,001 - $250,000	0	0.0	2.0	0	0.0	11.6	1	2.5	5.8	150	12.0	16.7	
$250,001 - $1 Million	2	33.3	2.7	1,077	88.1	44.6	0	0.0	5.5	0	0.0	49.7	
Total	6	100.0	100.0	1,222	100.0	100.0	40	100.0	100.0	1,250	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	60.0		45	4.0		12	100.0		440	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	2	40.0		1,077	96.0		0	0.0		0	0.0		
Total	5	100.0		1,122	100.0		12	100.0		440	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Seaside, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	39.6	0	0.0	35.0	0	0.0	42.5	0	0.0	34.5	49.3
Upper	0	0.0	58.3	0	0.0	62.2	0	0.0	55.0	0	0.0	64.4	50.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.1	0	0.0	2.8	0	0.0	2.5	0	0.0	1.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms
Assessment Area: Seaside, OR

	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	58.3	0	0.0	70.3	0	0.0	50.0	0	0.0	24.5	90.4
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		9.6
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	93.8	0	0.0	62.7	0	0.0	82.5	0	0.0	29.8	
$100,001 - $250,000	0	0.0	6.3	0	0.0	37.3	0	0.0	10.0	0	0.0	28.9	
$250,001 - $500,000	0	0.0	0.0	0	0.0	0.0	0	0.0	7.5	0	0.0	41.4	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Seaside, OR												
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0	
Total	0	0.0		0	0.0		0	0.0		0	0.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Seaside, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	21	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	21	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	21	100.0%	1	100.0%	21	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	40	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	100.0%	40	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	40	100.0%	2	100.0%	40	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	33.3%	40	36.7%
Moderate	0	0.0%	0	0.0%	1	16.7%	9	8.3%

Low/Moderate Total	0	0.0%	0	0.0%	3	50.0%	49	45.0%
Middle	6	100.0%	109	100.0%	1	16.7%	20	18.3%
Upper	0	0.0%	0	0.0%	2	33.3%	40	36.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	109	100.0%	6	100.0%	109	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	22.2%	40	23.5%
Moderate	0	0.0%	0	0.0%	1	11.1%	9	5.3%
Low/Moderate Total	0	0.0%	0	0.0%	3	33.3%	49	28.8%
Middle	9	100.0%	170	100.0%	1	11.1%	20	11.8%
Upper	0	0.0%	0	0.0%	5	55.6%	101	59.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	170	100.0%	9	100.0%	170	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Seaside, OR

	CONSUMER LOANS							
	By Tract Income				**By Borrower Income**			
	#	**%**	**$(000s)**	**%**	**#**	**%**	**$(000s)**	**%**
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	50.0%	10	52.6%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	1	50.0%	10	52.6%
Middle	1	50.0%	10	52.6%	0	0.0%	0	0.0%
Upper	1	50.0%	9	47.4%	1	50.0%	9	47.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	19	100.0%	2	100.0%	19	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	13	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	13	100.0%

Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	13	100.0%	1	100.0%	13	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	1	12.5%	7	2.6%
Moderate	0	0.0%	0	0.0%	2	25.0%	41	15.0%
Low/Moderate Total	0	0.0%	0	0.0%	3	37.5%	48	17.6%
Middle	4	50.0%	116	42.5%	2	25.0%	65	23.8%
Upper	4	50.0%	157	57.5%	3	37.5%	160	58.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	8	100.0%	273	100.0%	8	100.0%	273	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	18.2%	17	5.6%
Moderate	0	0.0%	0	0.0%	2	18.2%	41	13.4%
Low/Moderate Total	0	0.0%	0	0.0%	4	36.4%	58	19.0%
Middle	6	54.5%	139	45.6%	2	18.2%	65	21.3%
Upper	5	45.5%	166	54.4%	5	45.5%	182	59.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	305	100.0%	11	100.0%	305	100.0%

2020 Seaside, OR 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	1,730	18.0
Moderate	0	0.0	0	0.0	0	0.0	1,613	16.8
Middle	8	66.7	7,082	73.7	982	13.9	1,720	17.9
Upper	3	25.0	2,525	26.3	141	5.6	4,544	47.3
Unknown	1	8.3	0	0.0	0	0.0	0	0.0
Total AA	**12**	**100.0**	**9,607**	**100.0**	**1,123**	**11.7**	**9,607**	**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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	17,774	6,669	69.9	37.5	5,490	30.9	5,615	31.6
Upper	4,005	2,877	30.1	71.8	690	17.2	438	10.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**21,779**	**9,546**	**100.0**	**43.8**	**6,180**	**28.4**	**6,053**	**27.8**

2020 Seaside, OR AA Demographics								
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,248	83.8	2,120	83.8	102	81.6	26	92.9
Upper	435	16.2	410	16.2	23	18.4	2	7.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,683**	**100.0**	**2,530**	**100.0**	**125**	**100.0**	**28**	**100.0**
Percentage of Total Businesses:				**94.3**		**4.7**		**1.0**
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	36	49.3	32	48.5	4	57.1	0	0.0
Upper	37	50.7	34	51.5	3	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**73**	**100.0**	**66**	**100.0**	**7**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**90.4**		**9.6**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Seattle-Bellevue-Kent, WA MD													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.7	0	0.0	3.3	0	0.0	4.6	0	0.0	3.3	3.8
Moderate	0	0.0	26.5	0	0.0	22.4	0	0.0	27.5	0	0.0	22.9	25.7
Middle	0	0.0	56.1	0	0.0	57.5	2	66.7	57.0	545	50.0	59.0	56.2
Upper	0	0.0	12.7	0	0.0	16.8	1	33.3	11.0	546	50.0	14.8	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Seattle-Bellevue-Kent, WA MD													
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	1,091	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.3	0	0.0	2.6	0	0.0	2.9	0	0.0	2.3	3.8
Moderate	0	0.0	24.4	0	0.0	21.3	1	14.3	22.0	132	7.9	18.9	25.7
Middle	0	0.0	57.1	0	0.0	57.4	5	71.4	56.5	1,337	79.6	56.7	56.2
Upper	1	100.0	15.2	204	100.0	18.7	1	14.3	18.5	210	12.5	22.0	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	204	100.0	100.0	7	100.0	100.0	1,679	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.6	0	0.0	2.0	0	0.0	2.4	0	0.0	2.1	3.8
Moderate	0	0.0	22.1	0	0.0	19.4	0	0.0	21.5	0	0.0	19.1	25.7
Middle	1	50.0	58.9	123	55.2	59.7	0	0.0	59.1	0	0.0	58.3	56.2
Upper	1	50.0	16.4	100	44.8	18.8	1	100.0	17.1	250	100.0	20.5	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	223	100.0	100.0	1	100.0	100.0	250	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	20.4	0	0.0	12.8	0	0.0	26.3	0	0.0	51.1	24.0
Moderate	0	0.0	49.5	0	0.0	33.4	0	0.0	40.8	0	0.0	22.4	38.1
Middle	0	0.0	26.2	0	0.0	37.7	0	0.0	26.3	0	0.0	21.2	35.4
Upper	0	0.0	3.9	0	0.0	16.0	0	0.0	6.6	0	0.0	5.4	2.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	3.9	0	0.0	3.4	0	0.0	3.3	0	0.0	3.2	3.8
Moderate	0	0.0	25.1	0	0.0	22.3	1	9.1	23.4	132	4.4	20.2	25.7
Middle	1	33.3	56.7	123	28.8	56.5	7	63.6	56.8	1,882	62.3	57.0	56.2
Upper	2	66.7	14.3	304	71.2	17.8	3	27.3	16.5	1,006	33.3	19.6	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	427	100.0	100.0	11	100.0	100.0	3,020	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Seattle-Bellevue-Kent, WA MD

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.2	0	0.0	2.2	0	0.0	2.2	0	0.0	1.5	3.8
Moderate	0	0.0	22.4	0	0.0	17.8	0	0.0	19.7	0	0.0	17.2	25.7
Middle	0	0.0	57.4	0	0.0	58.0	0	0.0	58.1	0	0.0	57.3	56.2
Upper	0	0.0	17.1	0	0.0	22.0	0	0.0	20.0	0	0.0	24.0	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.9	0	0.0	1.4	0	0.0	1.7	0	0.0	0.8	3.8
Moderate	0	0.0	24.0	0	0.0	19.4	0	0.0	20.3	0	0.0	16.6	25.7
Middle	0	0.0	58.7	0	0.0	59.8	0	0.0	65.9	0	0.0	67.5	56.2
Upper	0	0.0	14.5	0	0.0	19.4	0	0.0	12.1	0	0.0	15.1	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.4	0	0.0	2.0	0	0.0	4.2	0	0.0	3.6	3.8
Moderate	0	0.0	28.3	0	0.0	24.0	0	0.0	31.4	0	0.0	29.6	25.7
Middle	0	0.0	55.2	0	0.0	55.0	0	0.0	57.0	0	0.0	56.4	56.2
Upper	0	0.0	14.2	0	0.0	19.0	0	0.0	7.4	0	0.0	10.4	14.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Seattle-Bellevue-Kent, WA MD

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	4.6	0	0.0	2.5	0	0.0	5.2	0	0.0	2.9	23.0
Moderate	0	0.0	21.3	0	0.0	16.6	0	0.0	23.8	0	0.0	19.5	20.3
Middle	0	0.0	29.7	0	0.0	28.8	2	66.7	29.2	591	54.2	29.3	23.5

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Seattle-Bellevue-Kent, WA MD													
Upper	0	0.0	31.5	0	0.0	40.0	1	33.3	35.6	500	45.8	42.5	33.2
Unknown	0	0.0	12.9	0	0.0	12.1	0	0.0	6.2	0	0.0	5.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	1,091	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.8	0	0.0	4.9	0	0.0	6.1	0	0.0	3.8	23.0
Moderate	1	100.0	19.4	204	100.0	15.5	2	28.6	20.0	375	22.3	16.4	20.3
Middle	0	0.0	27.3	0	0.0	26.4	4	57.1	27.3	1,094	65.2	26.7	23.5
Upper	0	0.0	30.7	0	0.0	37.1	1	14.3	32.3	210	12.5	38.2	33.2
Unknown	0	0.0	14.7	0	0.0	16.0	0	0.0	14.2	0	0.0	15.0	0.0
Total	1	100.0	100.0	204	100.0	100.0	7	100.0	100.0	1,679	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.3	0	0.0	5.0	0	0.0	7.0	0	0.0	5.4	23.0
Moderate	0	0.0	18.7	0	0.0	15.5	0	0.0	19.6	0	0.0	15.9	20.3
Middle	2	100.0	32.3	223	100.0	29.8	0	0.0	30.2	0	0.0	27.8	23.5
Upper	0	0.0	41.0	0	0.0	46.8	1	100.0	41.2	250	100.0	48.1	33.2
Unknown	0	0.0	1.7	0	0.0	2.8	0	0.0	1.9	0	0.0	2.8	0.0
Total	2	100.0	100.0	223	100.0	100.0	1	100.0	100.0	250	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.4	0	0.0	3.8	0	0.0	5.9	0	0.0	3.5	23.0
Moderate	1	33.3	20.0	204	47.8	15.9	2	18.2	20.8	375	12.4	17.2	20.3
Middle	2	66.7	28.5	223	52.2	27.5	6	54.5	27.7	1,685	55.8	27.4	23.5
Upper	0	0.0	31.9	0	0.0	38.7	3	27.3	33.4	960	31.8	39.5	33.2
Unknown	0	0.0	13.2	0	0.0	14.1	0	0.0	12.3	0	0.0	12.4	0.0
Total	3	100.0	100.0	427	100.0	100.0	11	100.0	100.0	3,020	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Seattle-Bellevue-Kent, WA MD													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	8.2	0	0.0	5.2	0	0.0	7.3	0	0.0	4.8	23.0
Moderate	0	0.0	19.1	0	0.0	13.5	0	0.0	18.7	0	0.0	14.5	20.3
Middle	0	0.0	29.2	0	0.0	25.8	0	0.0	28.2	0	0.0	26.7	23.5
Upper	0	0.0	41.4	0	0.0	53.0	0	0.0	44.6	0	0.0	52.7	33.2
Unknown	0	0.0	2.1	0	0.0	2.5	0	0.0	1.2	0	0.0	1.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Seattle-Bellevue-Kent, WA MD

Other Purpose Closed/Exempt													
Low	0	0.0	12.7	0	0.0	8.5	0	0.0	8.5	0	0.0	3.4	23.0
Moderate	0	0.0	20.5	0	0.0	16.2	0	0.0	16.3	0	0.0	11.8	20.3
Middle	0	0.0	26.9	0	0.0	24.6	0	0.0	27.0	0	0.0	27.4	23.5
Upper	0	0.0	34.4	0	0.0	44.2	0	0.0	42.0	0	0.0	54.0	33.2
Unknown	0	0.0	5.5	0	0.0	6.5	0	0.0	6.2	0	0.0	3.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.1	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	23.0
Moderate	0	0.0	5.0	0	0.0	4.2	0	0.0	0.0	0	0.0	0.0	20.3
Middle	0	0.0	7.4	0	0.0	9.9	0	0.0	0.0	0	0.0	0.0	23.5
Upper	0	0.0	5.9	0	0.0	10.5	0	0.0	0.4	0	0.0	0.4	33.2
Unknown	0	0.0	79.6	0	0.0	74.9	0	0.0	99.6	0	0.0	99.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: Seattle-Bellevue-Kent, WA MD

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	7.9	0	0.0	11.0	3	13.6	8.6	363	15.7	11.0	8.6
Moderate	0	0.0	27.5	0	0.0	28.6	6	27.3	29.1	683	29.6	30.4	29.8
Middle	0	0.0	48.0	0	0.0	44.9	7	31.8	47.6	457	19.8	44.4	48.7
Upper	1	100.0	15.1	730	100.0	14.4	6	27.3	13.9	804	34.9	13.5	12.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	1.0	0	0.0	0.8	0	0.0	0.6	
Total	1	100.0	100.0	730	100.0	100.0	22	100.0	100.0	2,307	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: Seattle-Bellevue-Kent, WA MD

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	48.9	0	0.0	33.1	3	13.6	40.8	38	1.6	23.6	93.9
Over $1 Million	1	100.0		730	100.0		2	9.1		328	14.2		5.4
Revenue Unknown	0	0.0		0	0.0		17	77.3		1,941	84.1		0.7
Total	1	100.0		730	100.0		22	100.0		2,307	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	95.2	0	0.0	41.8	16	72.7	88.3	425	18.4	33.8	
$100,001 - $250,000	0	0.0	2.2	0	0.0	11.5	2	9.1	6.7	249	10.8	19.3	
$250,001 - $1 Million	1	100.0	2.6	730	100.0	46.6	4	18.2	5.0	1,633	70.8	46.9	
Total	1	100.0	100.0	730	100.0	100.0	22	100.0	100.0	2,307	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		3	100.0		38	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		3	100.0		38	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography
Assessment Area: Seattle-Bellevue-Kent, WA MD

Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.5	0	0.0	0.4	0	0.0	1.5	0	0.0	1.4	0.8
Moderate	0	0.0	17.8	0	0.0	7.8	0	0.0	28.6	0	0.0	24.7	23.2
Middle	0	0.0	58.5	0	0.0	70.8	0	0.0	53.4	0	0.0	52.0	62.1
Upper	0	0.0	20.0	0	0.0	20.0	0	0.0	15.8	0	0.0	21.9	13.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: Seattle-Bellevue-Kent, WA MD													
Tract-Unk	0	0.0	2.2	0	0.0	0.9	0	0.0	0.8	0	0.0	0.1	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: Seattle-Bellevue-Kent, WA MD													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	0	0.0	56.3	0	0.0	39.6	0	0.0	40.6	0	0.0	32.2	97.2
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		2.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.4
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	92.6	0	0.0	49.1	0	0.0	85.0	0	0.0	34.9	
$100,001 - $250,000	0	0.0	5.9	0	0.0	34.0	0	0.0	9.0	0	0.0	26.1	
$250,001 - $500,000	0	0.0	1.5	0	0.0	16.9	0	0.0	6.0	0	0.0	39.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		0	0.0		0	0.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 Seattle-Bellevue-Kent, WA MD

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	40.0%	40	26.5%
Low/Moderate Total	0	0.0%	0	0.0%	2	40.0%	40	26.5%
Middle	3	60.0%	63	41.7%	2	40.0%	51	33.8%
Upper	2	40.0%	88	58.3%	1	20.0%	60	39.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	151	100.0%	5	100.0%	151	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	63	59.4%	0	0.0%	0	0.0%
Upper	1	50.0%	43	40.6%	2	100.0%	106	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	106	100.0%	2	100.0%	106	100.0%
	Other - Unsecured							
Low	1	14.3%	30	16.8%	0	0.0%	0	0.0%
Moderate	5	71.4%	129	72.1%	3	42.9%	60	33.5%
Low/Moderate Total	6	85.7%	159	88.8%	3	42.9%	60	33.5%
Middle	1	14.3%	20	11.2%	2	28.6%	70	39.1%
Upper	0	0.0%	0	0.0%	2	28.6%	49	27.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	179	100.0%	7	100.0%	179	100.0%
	Consumer Loan Totals							
Low	1	7.1%	30	6.9%	0	0.0%	0	0.0%
Moderate	5	35.7%	129	29.6%	5	35.7%	100	22.9%
Low/Moderate Total	6	42.9%	159	36.5%	5	35.7%	100	22.9%

Middle	5	35.7%	146	33.5%	4	28.6%	121	27.8%
Upper	3	21.4%	131	30.0%	5	35.7%	215	49.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	436	100.0%	14	100.0%	436	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 Seattle-Bellevue-Kent, WA MD

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	1	14.3%	3	2.2%
Moderate	3	42.9%	34	25.0%	2	28.6%	65	47.8%
Low/Moderate Total	3	42.9%	34	25.0%	3	42.9%	68	50.0%
Middle	2	28.6%	38	27.9%	1	14.3%	13	9.6%
Upper	2	28.6%	64	47.1%	3	42.9%	55	40.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	136	100.0%	7	100.0%	136	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	1	11.1%	10	3.9%
Moderate	2	22.2%	27	10.6%	2	22.2%	33	13.0%
Low/Moderate Total	2	22.2%	27	10.6%	3	33.3%	43	16.9%
Middle	5	55.6%	185	72.8%	3	33.3%	97	38.2%
Upper	2	22.2%	42	16.5%	3	33.3%	114	44.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	254	100.0%	9	100.0%	254	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	12.5%	13	3.3%
Moderate	5	31.3%	61	15.6%	4	25.0%	98	25.1%
Low/Moderate Total	5	31.3%	61	15.6%	6	37.5%	111	28.5%
Middle	7	43.8%	223	57.2%	4	25.0%	110	28.2%
Upper	4	25.0%	106	27.2%	6	37.5%	169	43.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	390	100.0%	16	100.0%	390	100.0%

2020 Seattle-Bellevue-Kent, WA MD AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	11	7.3	11,863	6.3	2,440	20.6	43,074	23.0
Moderate	45	29.8	52,770	28.2	5,319	10.1	38,020	20.3
Middle	74	49.0	97,962	52.3	4,263	4.4	44,057	23.5
Upper	19	12.6	24,777	13.2	787	3.2	62,221	33.2
Unknown	2	1.3	0	0.0	0	0.0	0	0.0
Total AA	**151**	**100.0**	**187,372**	**100.0**	**12,809**	**6.8**	**187,372**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	#	**% by unit**	#	**% by unit**
Low	25,996	6,799	3.8	26.2	17,282	66.5	1,915	7.4
Moderate	88,977	46,503	25.7	52.3	36,458	41.0	6,016	6.8
Middle	147,179	101,862	56.2	69.2	35,213	23.9	10,104	6.9
Upper	31,995	26,092	14.4	81.6	4,557	14.2	1,346	4.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**294,147**	**181,256**	**100.0**	**61.6**	**93,510**	**31.8**	**19,381**	**6.6**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	3,067	8.6	2,771	8.3	269	14.0	27	10.7
Moderate	10,587	29.8	9,889	29.7	636	33.1	62	24.5
Middle	17,302	48.7	16,420	49.3	758	39.4	124	49.0
Upper	4,551	12.8	4,250	12.8	261	13.6	40	15.8

2020 Seattle-Bellevue-Kent, WA MD AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**35,507**	**100.0**	**33,330**	**100.0**	**1,924**	**100.0**	**253**	**100.0**
Percentage of Total Businesses:				**93.9**		**5.4**		**0.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	0.8	3	0.6	1	8.3	0	0.0
Moderate	118	23.2	113	22.8	4	33.3	1	50.0
Middle	316	62.1	310	62.6	5	41.7	1	50.0
Upper	71	13.9	69	13.9	2	16.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**509**	**100.0**	**495**	**100.0**	**12**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**97.2**		**2.4**		**0.4**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: The Dalles, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.7	0	0.0	5.9	0	0.0	8.4	0	0.0	6.9	13.7
Middle	2	100.0	63.3	456	100.0	63.7	2	66.7	62.6	510	50.0	62.6	62.3
Upper	0	0.0	29.1	0	0.0	30.4	1	33.3	29.0	510	50.0	30.6	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	456	100.0	100.0	3	100.0	100.0	1,020	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	8.0	0	0.0	5.8	0	0.0	8.5	0	0.0	6.9	13.7
Middle	0	0.0	62.3	0	0.0	61.9	5	55.6	64.6	1,216	59.9	64.7	62.3
Upper	0	0.0	29.7	0	0.0	32.3	4	44.4	26.9	813	40.1	28.4	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	9	100.0	100.0	2,029	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: The Dalles, OR

Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.3	0	0.0	8.2	0	0.0	5.6	0	0.0	3.5	13.7
Middle	0	0.0	59.0	0	0.0	62.0	1	100.0	52.8	20	100.0	53.4	62.3
Upper	0	0.0	30.8	0	0.0	29.9	0	0.0	41.7	0	0.0	43.1	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	16.1	12.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	83.3	0	0.0	83.9	64.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.9	0	0.0	5.9	0	0.0	8.3	0	0.0	7.0	13.7
Middle	3	75.0	62.4	791	97.5	63.0	8	61.5	64.1	1,746	56.9	64.6	62.3
Upper	1	25.0	29.7	20	2.5	31.0	5	38.5	27.6	1,323	43.1	28.4	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	811	100.0	100.0	13	100.0	100.0	3,069	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: The Dalles, OR

Geographic Income Level	**Bank And Aggregate Loans By Year**												**Owner Occupied Units %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	7.7	0	0.0	2.2	13.7
Middle	1	50.0	63.3	335	94.4	63.5	0	0.0	73.1	0	0.0	76.3	62.3
Upper	1	50.0	36.7	20	5.6	36.5	0	0.0	19.2	0	0.0	21.5	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: The Dalles, OR													
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	355	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.8	0	0.0	13.5	0	0.0	7.1	0	0.0	3.7	13.7
Middle	0	0.0	47.1	0	0.0	44.4	0	0.0	78.6	0	0.0	87.8	62.3
Upper	0	0.0	41.2	0	0.0	42.1	0	0.0	14.3	0	0.0	8.5	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	18.2	0	0.0	14.6	0	0.0	0.0	0	0.0	0.0	13.7
Middle	0	0.0	63.6	0	0.0	68.8	0	0.0	72.2	0	0.0	74.4	62.3
Upper	0	0.0	18.2	0	0.0	16.6	0	0.0	27.8	0	0.0	25.6	24.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: The Dalles, OR													
Borrower Income Level	**Bank And Aggregate Loans By Year**												**Families by Family Income %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.5	0	0.0	0.9	0	0.0	3.0	0	0.0	1.6	18.3
Moderate	1	50.0	10.7	132	28.9	7.9	0	0.0	13.5	0	0.0	10.1	20.0
Middle	0	0.0	23.5	0	0.0	19.7	0	0.0	24.9	0	0.0	23.0	19.4
Upper	1	50.0	52.6	324	71.1	59.3	3	100.0	50.9	1,020	100.0	57.7	42.3
Unknown	0	0.0	11.7	0	0.0	12.3	0	0.0	7.8	0	0.0	7.5	0.0
Total	2	100.0	100.0	456	100.0	100.0	3	100.0	100.0	1,020	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	4.0	0	0.0	2.7	0	0.0	2.6	0	0.0	1.5	18.3
Moderate	0	0.0	11.8	0	0.0	8.3	1	11.1	8.2	103	5.1	5.8	20.0
Middle	0	0.0	23.3	0	0.0	19.8	4	44.4	19.9	1,010	49.8	16.5	19.4
Upper	0	0.0	41.2	0	0.0	46.7	3	33.3	46.3	710	35.0	51.4	42.3
Unknown	0	0.0	19.8	0	0.0	22.5	1	11.1	23.0	206	10.2	24.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	9	100.0	100.0	2,029	100.0	100.0	100.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: The Dalles, OR

Home Improvement Loans													
Low	0	0.0	5.1	0	0.0	1.6	0	0.0	11.1	0	0.0	8.4	18.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	11.1	0	0.0	7.2	20.0
Middle	0	0.0	33.3	0	0.0	25.9	0	0.0	5.6	0	0.0	3.4	19.4
Upper	0	0.0	61.5	0	0.0	72.5	1	100.0	72.2	20	100.0	81.0	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.9	0	0.0	1.8	0	0.0	2.9	0	0.0	1.6	18.3
Moderate	2	50.0	10.1	152	18.7	7.6	1	7.7	10.1	103	3.4	7.8	20.0
Middle	0	0.0	23.4	0	0.0	19.6	4	30.8	20.9	1,010	32.9	18.6	19.4
Upper	2	50.0	48.4	659	81.3	53.8	7	53.8	48.4	1,750	57.0	54.0	42.3
Unknown	0	0.0	15.2	0	0.0	17.2	1	7.7	17.6	206	6.7	18.1	0.0
Total	4	100.0	100.0	811	100.0	100.0	13	100.0	100.0	3,069	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: The Dalles, OR

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	3.8	0	0.0	0.7	18.3
Moderate	1	50.0	3.3	20	5.6	1.0	0	0.0	11.5	0	0.0	21.5	20.0
Middle	0	0.0	20.0	0	0.0	26.1	0	0.0	26.9	0	0.0	14.7	19.4
Upper	1	50.0	76.7	335	94.4	72.9	0	0.0	57.7	0	0.0	63.1	42.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	355	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	11.8	0	0.0	16.1	0	0.0	0.0	0	0.0	0.0	18.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	21.4	0	0.0	26.3	20.0
Middle	0	0.0	23.5	0	0.0	7.3	0	0.0	7.1	0	0.0	3.2	19.4
Upper	0	0.0	58.8	0	0.0	67.4	0	0.0	71.4	0	0.0	70.5	42.3
Unknown	0	0.0	5.9	0	0.0	9.2	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.0

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: The Dalles, OR

Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.4
Upper	0	0.0	9.1	0	0.0	14.1	0	0.0	0.0	0	0.0	0.0	42.3
Unknown	0	0.0	90.9	0	0.0	85.9	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography
Assessment Area: The Dalles, OR

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	33.3	9.0	75	5.8	21.0	12	14.8	10.2	2,045	26.7	16.3	10.8
Middle	3	50.0	68.7	1,144	89.2	64.0	58	71.6	71.5	4,322	56.4	68.3	69.7
Upper	1	16.7	19.8	64	5.0	13.0	11	13.6	17.1	1,298	16.9	14.6	19.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.5	0	0.0	2.0	0	0.0	1.1	0	0.0	0.8	
Total	6	100.0	100.0	1,283	100.0	100.0	81	100.0	100.0	7,665	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses
Assessment Area: The Dalles, OR

	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	50.0	57.2	117	9.1	36.4	13	16.0	53.2	1,905	24.9	41.9	92.7
Over $1 Million	3	50.0		1,166	90.9		4	4.9		303	4.0		5.9
Revenue Unknown	0	0.0		0	0.0		64	79.0		5,457	71.2		1.4
Total	6	100.0		1,283	100.0		81	100.0		7,665	100.0		100.0
By Loan Size													
$100,000 or Less	4	66.7	95.3	167	13.0	46.1	59	72.8	85.3	2,122	27.7	34.4	
$100,001 - $250,000	1	16.7	2.9	237	18.5	16.1	17	21.0	10.0	2,422	31.6	28.9	

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses Assessment Area: The Dalles, OR													
$250,001 - $1 Million	1	16.7	1.8	879	68.5	37.8	5	6.2	4.7	3,121	40.7	36.7	
Total	6	100.0	100.0	1,283	100.0	100.0	81	100.0	100.0	7,665	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	3	100.0		117	100.0		9	69.2		370	19.4		
$100,001 - $250,000	0	0.0		0	0.0		2	15.4		320	16.8		
$250,001 - $1 Million	0	0.0		0	0.0		2	15.4		1,215	63.8		
Total	3	100.0		117	100.0		13	100.0		1,905	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography Assessment Area: The Dalles, OR													
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	71.4	62.5	466	57.1	53.2	5	100.0	59.4	861	100.0	58.2	65.5
Upper	2	28.6	35.7	350	42.9	46.5	0	0.0	36.2	0	0.0	41.3	34.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.8	0	0.0	0.3	0	0.0	4.3	0	0.0	0.5	
Total	7	100.0	100.0	816	100.0	100.0	5	100.0	100.0	861	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: The Dalles, OR													
	Bank And Aggregate Loans By Year												**Total Farms %**
	2019						**2020**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	6	85.7	75.0	516	63.2	81.4	5	100.0	66.7	861	100.0	61.4	95.5
Over $1 Million	1	14.3		300	36.8		0	0.0		0	0.0		4.5

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms Assessment Area: The Dalles, OR													
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	7	100.0		816	100.0		5	100.0		861	100.0		100.0
By Loan Size													
$100,000 or Less	4	57.1	73.2	241	29.5	23.1	2	40.0	71.0	86	10.0	20.7	
$100,001 - $250,000	2	28.6	12.5	275	33.7	23.9	2	40.0	13.0	375	43.6	25.0	
$250,001 - $500,000	1	14.3	14.3	300	36.8	53.0	1	20.0	15.9	400	46.5	54.4	
Total	7	100.0	100.0	816	100.0	100.0	5	100.0	100.0	861	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	4	66.7		241	46.7		2	40.0		86	10.0		
$100,001 - $250,000	2	33.3		275	53.3		2	40.0		375	43.6		
$250,001 - $500,000	0	0.0		0	0.0		1	20.0		400	46.5		
Total	6	100.0		516	100.0		5	100.0		861	100.0		

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2019 The Dalles, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	40	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	40	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	40	100.0%	1	100.0%	40	100.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	50	100.0%	1	100.0%	50	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	50	100.0%	1	100.0%	50	100.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	2	50.0%	14	12.3%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	14	12.3%
Middle	4	100.0%	114	100.0%	1	25.0%	75	65.8%
Upper	0	0.0%	0	0.0%	1	25.0%	25	21.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	114	100.0%	4	100.0%	114	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	2	33.3%	14	6.9%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	2	33.3%	14	6.9%
Middle	5	83.3%	154	75.5%	1	16.7%	75	36.8%
Upper	1	16.7%	50	24.5%	3	50.0%	115	56.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	204	100.0%	6	100.0%	204	100.0%

Consumer Loan Distribution Table

Exam: FIB 2022 Exam

Assessment Area/Group :2020 The Dalles, OR

	CONSUMER LOANS							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Equity							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Motor Vehicle							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Secured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other - Unsecured							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	45	100.0%	1	50.0%	25	55.6%
Upper	0	0.0%	0	0.0%	1	50.0%	20	44.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	45	100.0%	2	100.0%	45	100.0%
	Consumer Loan Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

Middle	2	100.0%	45	100.0%	1	50.0%	25	55.6%
Upper	0	0.0%	0	0.0%	1	50.0%	20	44.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	45	100.0%	2	100.0%	45	100.0%

2020 The Dalles, OR 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	1,188	18.3
Moderate	1	12.5	912	14.0	128	14.0	1,303	20.0
Middle	5	62.5	4,057	62.4	437	10.8	1,261	19.4
Upper	2	25.0	1,537	23.6	179	11.6	2,754	42.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**8**	**100.0**	**6,506**	**100.0**	**744**	**11.4**	**6,506**	**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	1,434	858	13.7	59.8	453	31.6	123	8.6
Middle	7,628	3,904	62.3	51.2	2,313	30.3	1,411	18.5
Upper	2,361	1,501	24.0	63.6	675	28.6	185	7.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**11,423**	**6,263**	**100.0**	**54.8**	**3,441**	**30.1**	**1,719**	**15.0**

	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	151	10.8	138	10.6	13	15.7	0	0.0
Middle	977	69.7	901	69.4	59	71.1	17	89.5
Upper	273	19.5	260	20.0	11	13.3	2	10.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,401**	**100.0**	**1,299**	**100.0**	**83**	**100.0**	**19**	**100.0**
Percentage of Total Businesses:				**92.7**		**5.9**		**1.4**

2020 The Dalles, OR AA Demographics								
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	116	65.5	116	68.6	0	0.0	0	0.0
Upper	61	34.5	53	31.4	8	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**177**	**100.0**	**169**	**100.0**	**8**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.5**		**4.5**		**0.0**

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.