

# LARGE BANK

### Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

**Public Disclosure** 

August 22, 2005

**Community Reinvestment Act** 

## **Performance Evaluation**

Colorado Business Bank, National Association Charter Number: 16723

> 821 17th Street Denver, CO 80201

Office of the Comptroller of the Currency

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

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## **Overall CRA Rating**

**Institution's CRA Rating:** This institution is rated **Satisfactory.** 

The following table indicates the performance level of **Cobiz Bank, National Association** with respect to the Lending, Investment, and Service Tests:

	(Name of Depository Institution) Performance Tests				
Performance Levels	Lending Test*	Investment Test	Service Test		
Outstanding					
High Satisfactory	Х		Х		
Low Satisfactory		Х			
Needs to Improve					
Substantial Noncompliance					

<sup>\*</sup> The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- CBB has an excellent record of lending to small businesses in diverse geographies and a good record of lending to borrowers of various revenue levels.
- CBB originated a high volume of community development loans in its largest markets that were responsive to the identified needs of the assessment area.
- CBB demonstrated good performance in providing investments in its largest markets.
- CBB's branch delivery system provides good accessibility to individuals and small businesses in low- and moderate-income geographies in its largest markets.

### **Definitions and Common Abbreviations**

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

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

**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 MA/assessment area.

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

**Community Development:** Affordable housing (including multifamily rental housing) for low-or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

**Low-Income:** Individual 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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5

million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, 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 multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

## **Description of Institution**

Colorado Business Bank, N.A. (CBB) is a \$1.7 billion bank, headquartered in Denver, Colorado. The bank operates as an interstate bank with operations in the States of Colorado and Arizona. The Colorado branches operate under the name "Colorado Business Bank" and the Arizona branches operate under the name "Arizona Business Bank." CBB has one subsidiary, Colorado Business Leasing, Inc.

CBB is a wholly owned subsidiary of the holding company, CoBiz, Inc., headquartered in Denver, Colorado. The holding company operates: CoBiz Insurance, which offers property and casualty insurance brokerage and risk management consulting services; CoBiz Private Asset Management, which offers trust and fiduciary services; CoBiz GMB, Inc., which offers investment banking services; Alexander Capital Management Group, which offers stock and bond portfolio management for individuals and institutions; and Financial Designs, which offers wealth transfer and employee and executive benefit services for individuals and companies.

CBB operates eleven bank branches in Colorado and seven in Arizona. Seven of the Colorado branches are in the Denver Metropolitan Area (MA), three are in the Boulder MA, and one is in Eagle County, Colorado, a non-MA area. All the Arizona locations are in the Phoenix MA. The designated assessment areas (AA) include the following:

- Denver-Aurora MA;
- Boulder MA;
- Eagle County, Colorado; and
- Maricopa County, Arizona (Phoenix MA).

Bank customers are able to make deposits through Automated Teller Machines (ATM) operated by US Bank, NA and credit unions operating in Denver and at ATMs owned by Wells Fargo, NA in Arizona. The bank has 4 of its own ATMs with one each in Littleton, Edwards, and Boulder, Colorado and in Surprize, AZ.

CBB focuses on meeting the financial needs of professionals and lending to small- and medium-size businesses. In 2001, CoBiz identified a similar need in the Phoenix, Arizona market and completed acquisition of First Capital Bank.

The bank's loan portfolio totals \$1.2 million, and consists primarily of real estate and commercial loans. Although it is not CBB's primary focus, the bank makes some personal loans, primarily as an accommodation to existing business customers or their employees. Net loans represent 68% of the bank's total assets. Most of the bank's loan portfolio consists of real estate loans. With the distribution of the loan portfolio: 12% construction and development loans; 16% 1-4 family residential loans; and 40% of other real estate loans including commercial and multi-family loans. Commercial and industrial loans not secured by real estate total 29% of the total portfolio. Other consumer loans and lease financing comprise the remaining 3% of the portfolio. The bank has only a minimal amount of agricultural loans. Loans are supported by Net Tier One Capital of \$131 million.

There are no legal, financial, or other factors which would impede the bank's ability to help meet the needs of its assessment areas.

The last CRA examination for Colorado Business Bank was performed February 3, 2003. The bank received a "Satisfactory" rating. The examination was conducted using the "Large Bank CRA" procedures, which focuses on the bank's lending, investment, and service activities.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

We evaluated CBB's CRA performance using the Large Bank Tests in the revised CRA regulation. For the lending test, we considered loan originations beginning February 3, 2003, through December 31, 2004. For community development (CD) loans, investments, and services the evaluation period from February 3, 2003 through August 22, 2005.

Market comparisons for HMDA and small business lending are based on 2004 peer data. This is the most recent data available at the time of this evaluation.

We gave the greatest weight to small business loans as this continues to be the bank's strategic focus. Small business loans are identified as a credit need in the bank's AA. We place little emphasis on Home Mortgage Disclosure Act (HMDA) loans since CBB originates mortgage loans only as an accommodation to its business customers and employees and the volume of HMDA-reportable loans is nominal.

For the investment and service tests, we evaluated investments and donations, retail services, including branch distribution and accessibility; and CD services.

#### **Data Integrity**

Prior to this CRA examination, we reviewed data integrity to assess the accuracy of CBB's publicly reported CRA loan and HMDA data. During the CRA examination, we reviewed the accuracy of other CRA performance data. We did not identify any significant errors in either the CRA or HMDA loan data.

#### Selection of Areas for Full-Scope Review

We performed full-scope reviews in each state where the bank has offices. Our review included full-scope reviews of the following AAs: the Denver MA in Colorado and Maricopa County (Phoenix MA) in Arizona. The bank has a substantial share of its deposits, facilities, and loans in Denver. Since the bank is small in comparison to many of its competitors, it does not have a significant market share in any AA. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected.

#### **Ratings**

The bank's overall rating is a blend of the state ratings. We placed the most weight on our analysis of activity in the State of Colorado in determining our overall conclusion. This is based on CBB originating 78% of its loans and 82% of its deposits in Colorado. The State ratings are based primarily on those areas that received full-scope reviews. Refer

to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

# **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## **State Rating**

#### State of Colorado

CRA Rating for Colorado: Satisfactory

The lending test is rated: High-Satisfactory
The investment test is rated: Low-Satisfactory
The service test is rated: High-Satisfactory

The major factors that support this rating include:

- CBB demonstrated good responsiveness to credit needs within the full-scope AA. Lending performance was significantly enhanced by the volume of CD loans targeting identified community needs.
- CBB has an excellent record of lending to small businesses in diverse geographies and a good record of lending to businesses of various revenue levels.
- CBB demonstrated adequate performance in providing investments that address low- and moderate-income (LMI) housing needs.
- CBB's branch delivery system provides good accessibility to all geographies and individuals of varying income levels.

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

The vast majority of CBB's operations are in Colorado. CBB operates eleven full service branches and customers are able to make deposits in numerous US Bank and credit unions. The bank also operates three ATMs, one each in Littleton, Boulder, and Edwards. The Colorado branches are located in cities of Denver, Littleton, Louisville, Englewood, Golden, Boulder, Greenwood Village, and Edwards.

CBB has three assessment areas (AA) in Colorado. These are the Denver Metropolitan Area (MA), the Boulder MA, and Eagle County non-MA. Major banking competitors include Colorado State Bank and Trust; Guaranty Bank and Trust Company; US Bank, NA; Wells Fargo, NA; Vectra Bank, NA; Compass Bank, and J. P. Morgan Chase Bank, NA. In addition, the bank competes with large interstate mortgage companies and credit card lenders that do not take deposits from the area.

The Denver MA represents the bank's most significant market in Colorado with over 80% of the bank's deposits and 79% of the loans. The Boulder-Longmont MA accounts for 16% of the bank's deposits and 19% of the loans; and the Eagle County non-MA has 4% of the bank's deposits and 2% of the loans.

Refer to the market profiles for the State of Colorado in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in Colorado

The Denver MA received a full-scope review. The Boulder MA and Eagle County non-MA received limited-scope reviews. The ratings are based primarily on the results of the area that received a full-scope review. Refer to the tables in Appendix A for more information.

We reviewed seven community contacts completed by the OCC or other regulatory agencies during the examination period. Community contacts on file include representatives from organizations that promote small business development and affordable housing.

We also performed one contacts during the exam. Our contact indicated the greatest needs are for affordable loans to small business owners. Other contacts indicated an ongoing need for affordable housing.

### **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Colorado is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Denver MA is good.

### **Lending Activity**

Refer to Table 1 in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's lending activity for the 2003 and the 2004 reporting periods.

In the evaluation of the bank's lending performance, we gave more weight to small loans to businesses. This is due to the bank's heavier volume of small business loans versus home mortgage loans, which are nominal in number and dollar amount in comparison. Community development loans carried significant weight in the final analysis due to their inherently beneficial impact on segments of the community deemed most in need. The bank does not make a significant number of agricultural loans.

Overall, CBB's lending volume in CRA reportable loans is considered good. In the Denver MA, the lending activity during the reporting periods is commensurate with the bank's deposit taking activity.

CBB's lending levels for small loans to businesses represents good responsiveness to area credit needs in the full-scope AA. June 2004 deposit market share data indicates that in the Denver MA, CBB held a 1.92% market share of deposits and ranked 11th among 96 FDIC-insured financial institutions. In comparison, the bank achieved a 1.02% market share in small loans to businesses during in 2004 and ranked 14th among 268 reporting lenders. These statistics show that in its most important loan product, the bank's lending activity is comparable to its deposit taking activity in the full-scope AA.

For HMDA lending products in the Denver AA, the bank had less than a 1% reportable market share when compared to other area lenders. This is below the bank's 1.92% market share for deposits in the AA. The highly competitive nature of the home mortgage lending market, coupled with the bank's business lending focus, are mitigating factors to the bank's low market penetration.

## Distribution of Loans by Income Level of the Geography

The geographic distribution of small loans to businesses reflects good penetration in the Denver AA, particularly in the LMI geographies. The geographic distribution of CBB's home mortgage loans in the Denver AA reflects low penetration in LMI geographies. However, as stated previously, CBB originates mortgage loans only as an accommodation to the bank's business customers and their employees.

#### Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Colorado section of Appendix D, for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases for the 2003 and the 2004 reporting periods. As noted in the tables, HMDA loan volume is low and conclusions carry little weight when assessing the bank's overall lending performance for geographic distribution. From January 1, 2003 through December 31, 2004, the bank extended 65 home mortgage loans, 2 of which were for multifamily housing. The low volume of demographic comparatives, coupled with low volumes of home purchase, home improvement, and home refinancing in the Denver AA can create a situation where one loan could significantly skew lending performance analysis.

Given the low volume of HMDA lending, analysis of the bank's home mortgage lending in the Denver AA is not meaningful. However, we did review geographic distribution for the HMDA reportable loans, including home purchase, home refinance, and home improvement. The bank does not have a measurable market share for any of these housing-related products. A review of the distribution indicates that these loans were originated primarily in middle- and upper-income census tracts. This did not impact our overall analysis of lending activity.

We reviewed geographic distribution of multifamily loans in the Denver MA. Table 5 in the State of Colorado section of Appendix D for 2003 and 2004 reporting periods reflects that the bank made a minimal number of reportable loans. Nevertheless, the bank originated one multifamily loan in 2004 that is located in a moderate-income tract, and one loan in 2003 in a low-income tract. Although the bank had minimal lending activity, the loans originated to multifamily housing are in low- and moderate-income tracts.

#### Small Loans to Businesses

Refer to Table 6 in the State of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses for the 2003 and the 2004 reporting periods.

The geographic distribution of small loans to businesses is excellent in the Denver AA in both the 2003 and 2004 reporting periods. The distribution of loans in moderate-income tract

geographies substantially exceeds the demographics. Performance in low-income tracts is reflective of AA demographics. Lending volume is low, but is mitigated by the volume of competitors as indicated by the modest market share held by the bank. This supports the bank's market niche of serving the small- and medium-size business community.

## Lending Gap Analysis

We reviewed reports detailing CBB's lending activity in the full-scope AA over the evaluation period for small loans to businesses and home mortgage loans (as applicable) to identify gaps in the geographic distribution. We did not identify any unexplained conspicuous gaps. The absence of unexplained gaps in the bank's lending had a positive effect on our conclusion about the geographic distribution of CBB's lending activity.

#### Inside/Outside Ratio

A review of lending activity revealed that a majority of the loans by number and dollar volume were originated within the defined AAs. Our analysis included all small loans to businesses, home mortgage loans, and CD loans originated or purchased by CBB. This analysis was performed at the bank level rather than the state or AA level and therefore includes both Colorado and Arizona lending activities.

Fully, 91% of the small loans to businesses by number, and 90% by dollar volume were in the AA for the 2004 reporting period. During the 2003 reporting period, 90% of the small loans to businesses by number and 88% by dollar volume were within the AA. In 2004, 84% by number, and 39% by dollar volume, of home mortgage loans were originated within the AA. In 2003, 92% by number, and 86% by dollar, of home mortgage loans were originated within the AA. One hundred percent of the CD loans were made to borrowers within the bank's AAs for 2004. The strong performance of the bank's practice of lending within its AA factored positively into conclusions in the overall Lending Test.

## Distribution of Loans by Income Level of the Borrower

The borrower distribution of CBB's loans to businesses in the Denver MA reflects adequate dispersion among borrowers of different income levels. The distribution of home mortgage loans is not meaningful.

## Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases for the 2003 and the 2004 reporting periods.

CBB's borrower distribution of home mortgage loans is not meaningful due to the nominal number of home mortgage loans. When seen in the context of the bank's market niche for providing loans to small- and medium-sized businesses in the AA and the low volume of mortgage loans generated, this performance carries little weight in the overall Lending Test conclusion.

#### Small Loans to Businesses

Refer to Table 11 in the State of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses for the 2003 and the 2004 reporting periods.

The borrower distribution of loans to small businesses is satisfactory in the Denver AA. The percentage of loans to small businesses is below the percentage of small businesses in the area. However, over 50% of the bank's loans extended during 2003 reporting period were for amounts of \$100 thousand or less. The bank's performance in 2004 fell slightly lower at 48%. CBB's market share of small loans made to small businesses exceeds its overall market share for small loans to all businesses, indicating an emphasis on small business lending within the bank's commercial lending activities.

### **Community Development Lending**

Refer to Table 1, Lending Volume in the State of Colorado 2004 section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CBB made a significant volume of CD loans in the Denver AA. CD lending had a positive impact in the formulation of the final Lending Test conclusions.

The bank demonstrated excellent performance in making CD loans within the Denver MA. We compared CD loans to net Tier One Capital as one measure of CBB's capacity. Total CD loans originated in the Denver AA equaled 22% of average Tier One Capital allocated to this AA by the percentage of deposits derived from the area. This indicates a strong commitment of funds to meet community needs. The performance in this AA weighted heaviest in the overall determination of the bank's performance under the lending test, since a large percentage of the bank's loans and deposits are originated in this area. The bank's CD lending focused on addressing affordable housing and services for LMI individuals. The loans had a positive impact on the community by meeting these important needs. The following is a sample of the loans targeted at the most significant community needs:

- CBB provided \$591 thousand to construct a condominium project approved under the Inclusionary Housing Ordnance (IHO) to supply "affordable" workforce housing within the city of Denver.
- CBB provided \$9.4 million to construct a phase of a condominium project approved by the Inclusionary Housing Ordnance (IHO) to promote the development of "affordable " housing throughout Denver. This condominium project will provide a minimum of 10% of the housing to moderate-income families.
- CBB provided \$280 thousand to refinance a 6 unit apartment building that qualify as low income through the Englewood housing authority section 8 program.

• CBB provided \$525 thousand to a complete a multifamily housing project under the Denver Housing Authority's Section 8 Housing Subsidy Plan.

### **Product Innovation and Flexibility**

CBB does not offer any specific innovative or flexible loan programs. However, the lenders do work with individuals to tailor the bank's loan products to each borrower's specific needs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Refer to Tables 1 through 12 in the State of Colorado section of Appendix D for the facts and data that support these conclusions for the 2004 and the 2003 reporting periods.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Boulder MA and Eagle County non-MA is consistent with the bank's overall "High-Satisfactory" performance under the Lending Test in Colorado. In the Boulder MA, geographic distribution of small loans to businesses in the 2003 reporting period is comparable to the percent of businesses in low-income areas and exceeds the percent of businesses located in the moderate-income area. During the 2004 reporting period small loans to businesses did not meet the percent of businesses in low-income tracts, but did meet the percent of businesses in moderate-income tracts. In the Eagle County non-MA, geographic distribution of small loans to businesses is not meaningful because all census tracts are upper income. Overall, results of the limited-scope reviews had minimal impact on the evaluation for the bank's performance under the Lending Test.

#### **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in Colorado is rated "Low-Satisfactory." Based on the full-scope review, the bank's performance in the Denver MA is adequate. Total current investments and unfunded commitments for Colorado equal 6.4% of allocated Tier 1 capital. The only current period investments were in SBICs, which do not specifically target the Denver MA.

Qualified investments consist of the following:

• \$1 million represents an allocated portion of three investments in Small Business Investment Corporations (SBIC), which provide funds for size eligible businesses in a greater regional area, including the bank's AA.

Prior period investments that are outstanding as of August 22, 2005 consist of:

• \$361 thousand represents investments in FNMA and FHLMC bonds, which provided financing for single-family homes for LMI individuals in the bank's AA.

- \$315 thousand represents an investment in a local housing authority. The proceeds were used to rehabilitate a 511-unit apartment building in the bank's AA. At least 75% of the units must be rented to LMI individuals.
- \$970 thousand represents an investment in a local urban renewal authority to revitalize the downtown area.

Unfunded commitments related to the SBICs total \$4.4 million for the Denver MA.

In addition, the bank and its affiliates extended 179 grants and donations totaling over \$140 thousand to organizations that focus on promoting economic development in LMI areas; providing affordable housing for LMI individuals; providing health, education, and other types of services for LMI individuals, and revitalizing and stabilizing LMI areas. The level of grants and donations had a positive effect on the evaluation for the performance under the Investment Test.

While none of the investments are considered innovative or complex, ABB was the cornerstone investor in one of the SBICs noted above.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

Based on limited scope reviews, the bank's performance under the Investment Test in the Boulder-Longmont MA and Eagle County non-MA is consistent with the bank's overall "Low-Satisfactory" performance under the Investment Test in Colorado. Similar to performance in the Denver MA, CD investments in the Boulder-Longmont MA and the Eagle County non-MA was limited to the allocated portion of SBICs, which do not specifically target the AAs.

#### SERVICE TEST

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in Colorado is rated "High Satisfactory." Based on a full-scope review of the Denver MA, the bank's performance is good.

Overall, CBB's branch delivery systems provide reasonable accessibility to geographies and individuals of different income levels. Alternative delivery systems enhance availability and have a positive impact on the level of the bank's delivery systems. The bulk of banking

services targets small-and medium-size businesses. CBB provides a good level of CD services that benefit the Denver AA.

### **Retail Banking Services**

Refer to Table 15 in the State of Colorado section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope AA. The bank has seven branch locations in the Denver MA. There were no branch closures during this evaluation period. There was one branch opened in a moderate-income geography. The branches are basically evenly divided among moderate-, middle-, and upper-income geographies. To provide an avenue for increased access in the Denver MA, CBB has an agreement with US Bank, N.A. (USB) to offer an effective alternative system for delivering teller-based services to individuals and businesses in all income geographies. USB's ATM network is available to all CBB customers throughout the MA for withdrawals and deposits. Distribution of USB's ATMs located in LMI geographies exceeds the distribution pf population living in such geographies. The expanded ATM service is offered to CBB customers for up to ten monthly transactions free of charge. This had a positive effect on the conclusion regarding the Service Test.

Office hours and services are comparable among all locations regardless of the income level of the geography. None of the branches have Saturday banking hours. Three of the branches have drive up facilities. Standard loan and deposit products are offered at all locations. Six branches in the Denver MA have Spanish-speaking employees to assist customers in overcoming language barriers in the service process. The bank also offers other alternative delivery systems, including internet banking, telephone banking, and courier service. Since the bank could not provide specific information on how LMI individuals and geographies are impacted by these alternative delivery systems, significant weight was not placed on them when drawing conclusions for the full-scope AA under the Service Test.

## **Community Development Services**

CBB's performance in providing CD services in the Denver MA is good. Although the bank's primary business focus is small-and medium-size businesses, CD services encompass a wide variety of community organizations, including social services and affordable housing targeting LMI individuals. During the evaluation period, management and employees of the bank and affiliates contributed over 1,300 hours of service to qualifying community organizations.

Within the Denver MA, CBB offers financial expertise and support to various entities. The following highlights the bank's efforts:

 An executive officer of the holding company is an active member of the board of directors, the executive committee, and the finance committee of an organization focusing on providing therapeutic and special education services to troubled boys and their families through residential programs. The organization provides residential care, family preservation services, and a day treatment program. The officer provides financial advice in analyzing prospective locations for the organization, pro-forma budget analysis, negotiations for the lease/purchase of properties, and assistance with strategic planning.

- An officer serves on the program committee of an organization that provides local human service programs and opportunities for individual and community involvement. The organization addresses the affordable housing crisis by building new homes and preserving existing properties. The officer reviews and advises the organization on its options for the deployment of funds raised through donations, grants, and government funding.
- An officer serves on the board of directors and serves on the loan committee of a local non-profit economic development corporation. The corporation provides access to the SBA 504 program and a self-funded loan fund. This loan fund can be used to provide small working capital loans to small businesses that meet the SBA's definition of an under-served business population category

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Refer to Table 1 through 12 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

Based on the limited-scope reviews of the Boulder/Longmont MA and Eagle County non-MA, the bank's performance under the Service Test is not inconsistent with the bank's overall "High Satisfactory" performance in Colorado. The distribution of branches in the Boulder/Longmont MA is reasonable. There is only one branch in the Eagle County non-MA. The level of retail banking services is consistent with the services offered in the Denver MA. The bank had two qualifying CD services in the Boulder/Longmont MA. The following is an example of the bank's efforts:

 An officer serves on the family selection committee in charge of interviewing prospective homeowners and reviewing financial information to qualify and ultimately select prospects for home ownership. The organization provides affordable housing for families in need.

## **State Rating**

#### State of Arizona

CRA Rating for Arizona: Satisfactory
The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

• CBB has an excellent record of lending to small businesses in diverse geographies and varying revenue levels.

- CBB demonstrated excellent performance in providing investments that benefit low- and moderate-income individuals and small businesses.
- CBB's branch delivery systems provide adequate accessibility to individuals and small businesses within its AA.

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

Refer to the market profiles for the State of Arizona in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

CBB operates seven full-service branches in Arizona. They are located in Phoenix, Gilbert, Chandler, Scottsdale, Surprise, and Tempe. The bank operates in its Arizona market under the name "Arizona Business Bank." CBB has been in the Arizona market since 2001. The bank has one ATM in Surprise, AZ. CBB's operations in Arizona account for 19% of total deposits and 29% of total loans.

Maricopa County comprises the only AA in Arizona. It is one of two counties comprising the Phoenix MA. CBB acquired and merged with First Capital Bank of Arizona in 2001. First Capital Bank's primary business focus was similar to CBBs, which is a target market of small-to medium-size businesses and professionals.

The bank's major competitors in this AA are Johnson Bank of Arizona, NA; FNB Arizona; Marshall and Isley Bank; Ironstone Bank; Compass Bank; Wells Fargo, NA; US Bank, NA; JP Morgan Chase, NA; and Merrill Lynch. In addition, the bank competes with large interstate mortgage companies and credit card lenders that do not take deposits from the AA.

## Scope of Evaluation in Arizona

The Maricopa MA received a full-scope review.

Refer to the tables in Appendix A for more information.

We reviewed four community contacts in Arizona completed by the OCC or other regulatory agencies during the examination. Community contacts on file include representatives from organizations that promote small business development, economic development, affordable housing and federal, state and local government officials.

Community contacts consistently stated that there is a great need for banking products that relieve the financial burden from high mortgage payments, due to a decline in affordable housing. Further, banks in the area are meeting the needs of small businesses, given an increased demand for very small loans to start small businesses. Contacts identified that there are many opportunities to lend to community development organizations.

#### LENDING TEST

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Arizona is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Maricopa County (Phoenix MA) is good.

### **Lending Activity**

Refer to Table 1, Lending Volume in the State of Arizona section of Appendix D for the facts and data used to evaluate the bank's lending activity for the 2003 and 2004 reporting periods.

In the evaluation of the bank's lending performance, we have noted that we gave more weight to small loans to businesses. This is due to the heavier volume of small business loans versus home mortgage loans, as well as the need for such products.

HMDA-reportable loans carried minimal weight in our analysis of this AA. Nevertheless, the bank made one multifamily loan in 2003 that is located in a moderate-income tract. The bank had similar performance in 2004 in multifamily lending.

CBB's lending levels for small loans to businesses represent good responsiveness to area credit needs in this AA. The June 2004 deposit market share data indicates that in the Phoenix MA, CBB held a 0.43% market share of deposits and ranked 17th among 63 financial institutions. In comparison, CBB has a 0.37% market share in small loans to businesses for the same period of time and ranked 21st among 332 reporting lenders.

During the reporting periods, the bank did not originate any farm loans in this AA.

### Distribution of Loans by Income Level of the Geography

#### Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases for the 2003 and the 2004 reporting periods.

CBB originated 28 HMDA loans in the Maricopa County AA during the review period. A review of the distribution of HMDA loans indicates that these loans were originated primarily in middle-and upper-income census tracts. Minimal weight was given to HMDA reportable lending given the primary lending focus of the bank and minimal market share. The bank does not have a significant market share for any of housing-related products.

#### Small Loans to Businesses

Refer to Table 6 in the State of Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses for the 2003 and the 2004 reporting periods.

The geographic distribution of small loans to businesses is good in the Maricopa AA for the reporting period. The distribution of loans in low-and moderate-income tract geographies substantially exceeds the demographics. The lending volume is low but a result of strong competition evidenced by the modest market share held by the bank. The bank's overall market share and its market share in any census tract are both well below 1%.

### Lending Gap Analysis

We reviewed reports detailing CBB's lending activity in the Maricopa County AA over the evaluation period for small loans to businesses and home mortgage loans (as applicable) to identify gaps in the geographic distribution. We did not identify any unexplained conspicuous gaps. The absence of unexplained gaps in the bank's lending had a positive effect on our conclusion about the geographic distribution of CBB's lending activity.

#### Inside/Outside Ratio

A review of lending activity revealed that a majority of the loans by number and dollar volume were originated within the defined AAs. Our analysis included all small loans to businesses, home mortgage loans, and CD loans originated or purchased by CBB. This analysis was performed at the bank level rather than the state or AA level and therefore includes both Colorado and Arizona lending activities.

Fully, 91% of the small loans to businesses by number and 90% by dollar volume were in the AA for the 2004 reporting period. During the 2003 reporting period, 90% of the small loans to businesses by number and 88% by dollar volume were within the AA. In 2004, 84% by number, and 39% by dollar volume, of home mortgage loans were originated within the AA. In 2003, 92% by number, 86% by dollar, of the home mortgage loans were originated within the AA. One hundred percent of the CD loans were made to borrowers within the bank's AAs for

2004. The strong performance of the bank's practice of lending within its AA factored positively into conclusions in the overall Lending Test.

## Distribution of Loans by Income Level of the Borrower

The borrower distribution of CBB's loans to businesses in the Maricopa County AA reflects adequate dispersion among borrowers of different income levels. As mentioned in a prior section of this evaluation, CBB reported a negligible number of home mortgage loans in this AA. When compared to the level of small business lending, minimal weight was attributed to the bank's lending patterns for home mortgage loans in this AA.

#### Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the State of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases for the 2003 and 2004 reporting periods.

CBB originates HMDA loans only as an accommodation to its business loan customers. Most of the loans the bank originated were to middle and upper-income borrowers. Although, lending volume in the multi-family category is low, loans originated were in moderate-income tracts. The bank has very little market share in any of its census tracts. Given the low volume of HMDA lending, further analysis of the bank's home mortgage lending in the Maricopa County AA would not be meaningful.

#### Small Loans to Businesses

Refer to Table 11 in the State of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses for 2003 and the 2004 reporting periods.

The distribution of loans to businesses of different sizes is good. The percentage of loans to small businesses is below demographics. However, approximately 68% of the small business loans originated during the review period were in amounts of \$250,000 or less demonstrating commitment to very small businesses. CBB's market share of small loans made to small businesses is substantially similar to its overall market share. However, both are well below 1%.

## **Community Development Lending**

Refer to Table 1, Lending Volume in the State of Arizona section of Appendix D for the facts and data used to evaluate the bank's level of CD lending for 2003 and 2004 reporting periods. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CBB demonstrated adequate performance in making CD loans within the Maricopa MA. We compared CD loans to net Tier One Capital as one measure of CBB's capacity. Total CD

loans originated in the Maricopa AA equal 21% of average Tier One Capital allocated to this AA by the percentage of deposits derived from the area. This indicates a good commitment of funds to meet community needs. As stated previously the bank's CD lending focused on addressing affordable housing and services for LMI individuals. The loans had a positive impact on the community by meeting these important needs. The following is a sample of the loans targeted at the most significant community needs:

 CBB provided \$3.7 million to purchase and renovate a multifamily apartment complex located in a moderate census tract in Phoenix Arizona.

## **Product Innovation and Flexibility**

CBB does not have any innovative or flexible loan programs. However, the lenders do work with individuals to tailor the bank's loan products to each borrower's specific needs. This had a neutral effect on the evaluation under the bank's performance of the Lending Test.

#### **INVESTMENT TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 in the State of Arizona section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in Arizona is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the Maricopa County MA is excellent. Total current investments and unfunded commitments for Arizona equal 10.1% of allocated capital. This is considered to be a high level of investments relative to the competition for CD investments in the AA.

Qualified investments consist of the following:

- \$935 thousand represents two investments in an industrial development authority, which provides funds for development of affordable rental units for LMI individuals in Maricopa County.
- \$303 thousand represents an allocated portion of three investments in Small Business Investment Corporations (SBIC), which provide funds for size eligible businesses in a greater regional area, including the bank's AA.

Prior period investments that are outstanding as of August 22, 2005 consist of:

- \$222 thousand represents investments in FNMA and FHLMC bonds, which provided financing for single-family homes for LMI individuals in the bank's AA.
- \$403 thousand represents investments in a FNMA bond, which provided financing for single-family homes for LMI individuals in the bank's AA.

• \$570 thousand provided financing for a multi-family housing project; 98% is designated for LMI families.

Unfunded commitments related to the SBICs total \$1.3 million for the Maricopa County MA.

In addition, the Arizona branches extended a portion of the grants and donations totaling over \$140 thousand for the bank as a whole. Refer to the State of Colorado Investment Test for details.

While none of the investments are considered innovative or complex, CBB was the cornerstone investor in one of the SBICs noted above.

#### SERVICE TEST

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in Arizona is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Maricopa County MA is good.

Overall, CBB's branch delivery systems provide reasonable accessibility to geographies and individuals of different income levels. Alternate delivery systems enhance availability and have a positive impact on the level of the bank's delivery systems. The bulk of banking services targets small-and medium-size businesses. CBB provides a good level of CD services that benefit the Maricopa County AA.

## **Retail Banking Services**

Refer to Table 15 in the State of Arizona section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope assessment area. There were no branch closures in the Maricopa County MA during this evaluation period. There were four branch openings, one in a middle-income geography and three in upper-income geographies. Two of the seven branches are located in moderate-income geographies. To provide an avenue for increased access in the Maricopa County MA, CBB has an agreement with Wells Fargo, N.A. to offer an alternative system for delivering teller based services to individuals and businesses in all income geographies. Wells Fargo's ATM network is available free of charge to all CBB customers throughout the MA for withdrawals and deposits.

Office hours and services are comparable among all locations regardless of the income level of the geography. None of the branches have Saturday banking hours. None of the branches have drive up facilities. Standard loan and deposit programs are offered at all locations. Four

branches in the Maricopa county MA have Spanish-speaking employees to assist customers in overcoming language barriers in the service process. Other alternative services, such as telephone and Internet banking, bank-by-mail, and courier service are also available. Since the bank could not provide specific information on how LMI individuals and geographies are impacted by these alternative delivery services, significant weight was not placed on them when drawing conclusions for the full-scope AA under the Service Test.

## **Community Development Services**

CBB's performance in providing CD services in the Maricopa County MA is good. Although the bank's primary business focus is small-and medium-size businesses, CD services encompass a wide variety of community organizations, including social services and affordable housing targeting LMI individuals. During the evaluation period, management and employees contributed over 750 hours of service to qualifying community organizations.

Within the Maricopa County MA, CBB offers financial expertise and support to various entities. The following highlights the bank's efforts:

- An officer serves on the board of governors and executive committee of a youth services organization that focuses on programs such as before and after school supervision, academic tutoring, nutrition oversight, and other youth development programs. The primary duty of the board of governors is fundraising for the youth programs. As Treasurer, the officer oversees financial affairs and manages the annual budget.
- An officer serves as a board member providing financial expertise to a non-profit corporation dedicated to economic development by providing affordable financing for small businesses.

## **Appendix A: Scope of Examination**

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

Time Period Reviewed	Lending Test (excludes CD loans): (02/03/2003 to 12/31/05) Investment and Service Tests and CD Loans: (02/03/03 to 08/22/05)		
Financial Institution		Products Reviewed	
Colorado Business Bank, NA (CBB Denver, Colorado	)	Small business, home purchase, home improvement, home refinance, and CD loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed	
List of Assessment Areas and Ty	/pe of Examination		
Assessment Area	Type of Exam	Other Information	
Colorado Denver MA #2080 Boulder MA #2025 Eagle County non-MA  Arizona Maricopa County (Phoenix MA) #6200	Full Scope Limited Scope Limited Scope Full Scope		

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

RATINGS BANK NAME							
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating			
Colorado Business Bank, N.A,	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory			
Multistate Metropolitan Area or State:							
Colorado	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory			
Arizona	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory			

<sup>(\*)</sup> The lending test is weighted more heavily than the investment and service tests in the overall rating.

## **Appendix C: Market Profiles for Full-Scope Areas**

#### State of Colorado

### Denver-Aurora MA #2080

Demographic Information for Full-	Scope Area	: (Denve	er Metropolit	an Area)		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	545	3.85	26.61	39.63	27.89	2.02
Population by Geography	2,179,24 0	4.56	27.71	40.28	27.32	0.12
Owner-Occupied Housing by Geography	570,412	1.89	21.89	42.97	33.26	0
Business by Geography	1808	3.15	35.67	28.10	33.08	0
Farms by Geography	0	0	0	0	0	0
Family Distribution by Income Level	550,797	3.59	25.24	40.61	30.56	0
Distribution of Low and Moderate Income Families throughout AA Geographies	200,515	7.73	42.18	36.92	13.17	0
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$64,753 = \$69,200 = 7.00%	Median Housing Value Unemployment Rate				= \$182,184 = 2.14%

 $<sup>(^{\</sup>star})$  The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2004 HUD updated MFI.

The Denver AA is comprised of nine contiguous counties including Adams, Arapahoe, Denver, Douglas, Jefferson, Elbert, Gilpin, Clear Creek, and Park Counties. There are 545 census tracts within the AA. The AA meets the regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

The city of Denver is the state's capital and the center of its economic activity. Other principal cities within the AA include Aurora, Brighton, Centennial, Commerce City, Englewood, Golden, Lakewood, Littleton, Thornton, and Westminster. As of 2004, the population within the Denver MA is estimated at 2,179,240.

The Denver MA represents 78% of rated loans made during the evaluation period and 82% of total bank deposits. CBB has eleven offices and numerous US Banks, credit unions, and various other banks accept deposits in the Denver AA. They also have 3 bank-owned ATMs in this MA.

Competition among the financial institutions in the AA is high. There are 96 banks in the Denver-Aurora MA operating 635 offices. There are 29 banks in the Boulder-Longmont MA operating 99 offices. There are 11 banks in the Eagle non-MA with 32 offices. This does not include credit unions, mortgage companies, or finance companies that aggressively compete for loan production. Some of the larger competitors include Wells Fargo, N.A.; U.S. Bank, N.A.; Bank One; Guaranty Bank and Trust Company; J. P. Morgan Chase N.A.; and Colorado State Bank and Trust, NA. Combined, these banks hold 47% of deposit market share within the Denver MA. CBB's market share is 1.92% with total deposits of \$690MM.

National studies point to Metro Denver as one of the nation's top centers for business. A study by the San Diego Economic Development Corporation found Metro Denver to be the second most competitive place in the US to do business. Venture capital investment in Colorado companies grew 40% over the previous year, ranking the state in the top five most active regions in the country according to the Money Tree Survey by Price Waterhouse Coopers. Denver's economy has diversified over the years with significant representation in technology, communications, manufacturing, tourism, transportation, aerospace, biomedical, and financial services.

The Colorado and Denver Metro economic growth outpaces the nation. Both Metro Denver and Colorado employment growth has outpaced the nation through the first six months of 2005. The year-to-date unemployment rate of 5.3% remains well below the 2004 level of 6 percent for the same period. Metro Denver employment levels increased by 10,700 positions in June of 2005 and the hiring pace is expected to continue at a strong pace in the third quarter of 2005. The largest percentage gains from May to June occurred in leisure and hospitality, natural resources, and construction. The hiring pace in Metro Denver will continue at a strong pace in the third quarter of 2005. About 32% of the companies interviewed for the latest Manpower Employment Outlook Survey plan to hire more employees, down slightly from 35% in the last quarter. Only 2% of the respondents said that they expect to reduce their payrolls while 63% expect to maintain their current staffing patterns.

Retail sales in Metro Denver were up 5% through May compared to the first five months of last year. While all counties experienced gains, the largest year-over-year gains occurred in Adams County (16.4%), Douglas County (12.8%), and Boulder County (10.8%). Statewide retail sales were up 6.4% through May.

Home appreciation in Colorado is relatively low compared to other markets. For the 12 months ending in March 2005, Colorado appreciation ranked 47<sup>th</sup> in the nation. In fact, appreciation averaged 4% per year over the past three years in Colorado compared to 10% average annual appreciation. The imbalance can be attributed to Colorado's lagging economic recovery. Analysts say the slowdown is healthy for an already pricey housing market and that Metro Denver is poised to be one of the stronger housing markets in the coming years.

Sales of previously owned homes in Metro Denver remain at lower levels than achieved in 2004. According to MetroList data through July 2005, home sales under contract were 2.4% lower than the same period last year while closed home sales were 2.2% below last year's levels. Inventory levels are up 5.2% over last year. Homes are staying on the market an average of 91 days compared to 85 days during the same time last year.

The median price of a single-family home increased 4% through the first seven months of 2005 compared to the same period in 2004. Median condo prices are up a minimal 1.7%. Still, the median price for a single-family home set another record in July of \$252,250. Higher-end homes are now selling faster than entry-level homes, which was not the case when interest rates fell to historically low levels.

Metro Denver foreclosures were up 13.7% through June 2005 compared to the first half of last year. While any increase in foreclosures is undesirable, the pace of the increase in 2005 is much improved compared to last year.

The Denver Metro Apartment vacancy and rent survey revealed mixed results for the metro apartment market, but it is still considered a renter's market. Vacancy rates fell to 8% in the second quarter from 9.3% in the first quarter, the lowest rate since third quarter 2001. Average rental rates slipped to \$826 per month during second quarter from \$836 per month, but remain above second quarter 2004 rates.

CB Richard Ellis reported that the Metro Denver office market experienced mixed results among the submarkets during second quarter 2005, while overall statistics remained relatively static. Average asking lease rates increased slightly to \$16.65 per square foot with the most competitive rates in the northeast submarket, averaging \$10.37 per square foot. Downtown rates finished the quarter at the top, averaging \$19.01 per square foot.

Grubb and Ellis also describe a tightening office market. Their four main submarkets (Downtown, Southeast Suburban, Northwest and Boulder) all reported positive absorption during second quarter 2005 and secondary suburban submarkets are beginning to show signs of improvement. Sublease space is shrinking at a rate of one million square feet per year and is hoped to fall to 2001 levels over the next 18 month. Grubb and Ellis pegs the second quarter metro fundamentals at a 20% vacancy rate with a \$20.24 per square foot Class A asking rent and a \$16.61 per square foot Class B asking rent.

Based on community contacts completed by the OCC and other regulatory agencies, we noted that there are a number of opportunities for bank involvement in community development activities. Please refer to the "Scope of Evaluation in Colorado" for additional details.

#### State of Arizona

## Maricopa County (Phoenix MA) #6200

Demographic Information for Full-Scope Area: Maricopa County (Phoenix MA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	663	6.03	27.30	34.69	31.37	0.60
Population by Geography	3,072,14 9	4.88	28.69	36.78	29.64	0.01
Owner-Occupied Housing by Geography	764,563	1.53	21.47	40.34	36.66	0.00
Business by Geography	616	10.39	29.71	25.00	34.90	0.00
Farms by Geography	0.00	0.00	0.00	0.00	0.00	0.00
Family Distribution by Income Level	768,800	3.51	25.74	37.82	32.93	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	289,057	7.44	41.75	36.25	14.56	0
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$55,915 = \$58,300 = 10.0%		Housing Value syment Rate	9		= \$130,648 = 2.31%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2000 U.S. Census, and 2004 HUD updated MFI.

Arizona Business Bank includes Maricopa County, Arizona in its AA. (Maricopa County is one of two counties in the Phoenix MA.) The bank operates within the urban area of the county where the city of Phoenix is the center of economic activity. Other principal cities within the AA include Avondale, Buckeye, Chandler, Goodyear, Glendale, Mesa, Scottsdale, Surprise, Tempe and Wickenburg. In addition to the urban cities in the county, there is a large unincorporated area and several Indian reservations.

Maricopa County is one of the largest counties in the country stretching 100 miles in diameter and covering 9,200 miles. The estimated population of Maricopa County MSA is 3,072,249. Within Maricopa County there are 663 census tracts. The 2004 HUD updated median family income is \$58,300. The AA meets the regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

Competition among the financial institutions in the AA is high. There are 62 banks operating 674 offices throughout the area. This does not include credit unions, mortgage companies, or finance companies that aggressively compete for loan production. The prevailing competitors include Johnson Bank Arizona, NA; FNB of Arizona; Marshall & Isley Bank; NB of Arizona; Ironstone Bank; Compass Bank; Wells Fargo, NA: US Bank, NA; and J. P. Morgan Chase

Bank, N.A. Combined, these banks hold 60% of deposit market share within the AA. CBB's market share is less than 1% with total deposits of \$186 million.

The Maricopa County AA represents 22% of rated loans made during the assessment period and 19% of total bank deposits. CBB has seven offices and numerous Wells Fargo ATMs accept deposits in the Maricopa County area. There is one bank-owned ATM in this MA.

For the year ending November 2004, the Phoenix metropolitan area showed the highest rate of job growth among metropolitan areas with more than 1 million workers according to the Blue Chip Job Growth Update. The December 2004 unemployment rate for the Phoenix metropolitan area was 3.2%, well below the national average and an improvement from the 4.2% rate at the end of 2003. Arizona was the second fastest growing state in the nation during both 2004 and 2003, and experienced a population growth rate of 40.0% between 1990 and 2000 as compared to the national growth rate of 13.1% during the same period. Arizona's economic sectors include trade, manufacturing, mining, agriculture, construction, and tourism, with services constituting the largest economic section.

Based on community contacts completed by the OCC and other regulatory agencies, we noted that there are a number of opportunities for bank involvement in community development activities. Please refer to the "Scope of Evaluation in Arizona" for additional detail.

## **Appendix D: Tables of Performance Data**

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are complied by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of Assessment Area" is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- **Table 1. Other Products** Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- **Table 2. Geographic Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

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- **Table 3.** Geographic Distribution of Home Improvement Loans See Table 2.
- **Table 4. Geographic Distribution of Home Mortgage Refinance Loans** See Table 2.
- **Table 5. Geographic Distribution of Multifamily Loans** Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 8. Borrower Distribution of Home Purchase Loans** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- **Table 9.** Borrower Distribution of Home Improvement Loans See Table 8.
- **Table 10. Borrower Distribution of Refinance Loans** See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of

the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- **Table 14. Qualified Investments** Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Charter Number: 16723** 

# **Tables of Performance Data**

Denver, Boulder and Eagle

**State of Colorado** 

## **Table 1. Lending Volume**

LENDING VOLUME				Geograpl	ny: COLOR	ADO 2003		Evaluation	n <b>Period</b> : JAI	NUARY 1, 2	2003 TO DE	CEMBER 31, 2003
	% of Rated Area	Home N	1ortgage		oans to	Small Loar	ns to Farms	Comr Developme	nunity ent Loans**	_	eported ans	% of Rated Area Deposits in MA/AA***
MA/Assessment Area (2003):	Loans (#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Denver 2003	79.00	40	4,732	983	189,116	0	0	0	0	1,023	193,848	80.31
Limited Review:			•		•	•	•	•				
Boulder 2003	19.31	12	2,061	238	40,969	0	0	0	0	250	43,030	16.3
Eagle 2003	1.70	3	555	19	3,550	0	0	0	0	22	4,105	3.39

<sup>\*</sup> Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* Community Development Loans were not evaluated for this reporting period.

\*\*\* Deposit Data as of June 30, 2004. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

## **Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: 31, 2003	HOME PUR	CHASE			Geograp	ohy: COLOF	RADO 2003		Evalua	tion Period	: Januaf	RY 1, 20	03 TO	DECEM	1BER
		Home e Loans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Marke	et Share	(%) by	Geogra	ıphy*
MA/Assessment Area:	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	6	60.00	1.96	0.00	22.03	0.00	42.18	50.00	33.82	50.00	0.01	0.00	0.00	0.01	0.01
Limited Review:	•			•				•			•			•	
Boulder 2003	4	40.00	0.25	0.00	18.89	0.00	45.89	50.00	34.97	50.00	0.04	0.00	0.00	0.04	0.05
Eagle 2003	0	0.00	0.00	0.00	0.00	0.00	5.14	0.00	94.86	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans** 

Geographic Distribution: DECEMBER 31, 2003	HOME IN	MPROVE	MENT		(	Geography:	COLORADO	2003	I	Evaluation l	Period: J	ANUARY	′ 1, 2003	ТО	
MA/Assessment Area:	Total I Improv Loa	ement	Low-Ir Geogra	ncome aphies		e-Income aphies	Middle- Geogr	Income aphies		Income aphies	Mai	rket Shar	e (%) by	Geograp	hy*
	#	% of Total* *	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	24	82.76	1.96	0.00	22.03	8.33	42.18	8.33	33.82	83.33	0.37	0.00	0.14	0.07	0.92
Limited Review:															
Boulder 2003	4	13.79	0.25	0.00	18.89	0.00	45.89	50.00	34.97	50.00	0.69	0.00	0.00	0.70	1.13
Eagle 2003	1	3.45	0.00	0.00	0.00	0.00	5.14	0.00	94.86	100.00	2.33	0.00	0.00	0.00	2.44

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** 

Geographic Distribution: DECEMBER 31, 2003	HOME I	MORTGA	GE REFINA	ANCE		Geogra	ohy: COLOR	ADO 2003		Evaluation	on Period	<b>:</b> JANU	ARY 1, 2	2003 TO	1
MA/Assessment Area:	Morto Refina	Total* Occ Occ				e-Income aphies		Income aphies		Income aphies	Mark	et Shar	e (%) by	Geogra	ohy*
	#			% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:											·				
Denver 2003	9	64.29	1.96	0.00	22.03	0.00	42.18	33.33	33.82	66.67	0.00	0.00	0.00	0.00	0.00
Limited Review:											l		L. L		
Boulder 2003	3	21.43	0.25	0.00	18.89	0.00	45.89	66.67	34.97	33.33	0.01	0.00	0.00	0.01	0.01
Eagle 2003	2	14.29	0.00	0.00	0.00	0.00	5.14	0.00	94.86	100.00	0.03	0.00	0.00	0.00	0.04

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)
\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans** 

2003	То	otal	Low-Ir	ncome	Moderate	e-Income	Middle-	Income	Upper-	Income	Mark	et Shar	e (%) by	Geogra	phy*
MA/Assessment Area:	_	family ans	Geogr	aphies	Geogr	aphies	Geogr	aphies	Geogr	aphies			. , .		•
	#	% of Total**	% of MF Units***	% of MF Units****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	1	50.00	8.56	100.00	40.78	0.00	41.82	0.00	8.84	0.00	0.24	1.39	0.00	0.00	0.00
Limited Review:															
Boulder 2003	1	50.00	4.89	0.00	36.25	0.00	42.65	100.00	16.21	0.00	2.04	0.00	0.00	4.17	0.00
Eagle 2003	0	0.00	0.00	0.00	0.00	0.00	0.23	0.00	99.77	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

<sup>\*\*</sup> Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distributi		DANS TO	BUSINES	SES		Geogra	aphy: COLC	)RADO 200	)3	Eval	uation Pe	eriod: JAN	IUARY 1,	2003 TO	
	Total Sr Business		_	ncome aphies	Moderate Geogra		Middle- Geogr			Income aphies	Ма	rket Shai	re (%) by	Geograph	ny*
MA/Assessment Area:	#	% of Total*	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp						
Full Review:															
Denver 2003	980	79.22	4.15	2.86	25.96	36.12	36.51	28.98	32.73	32.04	1.26	1.04	1.85	1.06	1.18
Limited Review:	•						•		•					•	
Boulder 2003	238	19.24	1.45	0.84	29.78	36.55	40.33	40.34	28.44	22.27	1.80	1.96	2.34	1.78	1.44
Eagle 2003	19	1.54	0.00	0.00	0.00	0.00	1.67	5.26	98.33	94.74	1.88	0.00	0.00	0.74	0.78

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

## **Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distributio DECEMBER 31, 2003	n: SMALL LOA	NS TO FA	RMS					RADO 200	)3	E	valuatio	n Period:	: JANUAF	RY 1, 200	3 TO
	Total Small Loans	Farm	Low-Ir Geogra	ncome aphies	Moderate- Geogra			Income aphies	Upper-li Geogra		Ma	rket Shar	e (%) by	Geograp	hy*
MA/Assessment Area:	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	0	0.00	1.74	0.00	21.74	0.00	39.36	0.00	37.04	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:	1									·	l		'	'	
Boulder 2003	0	0.00	0.00	0.00	20.84	0.00	50.82	0.00	28.34	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2003	0	0.00	0.00	0.00	0.00	0.00	7.97	0.00	92.03	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### **Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HC 2003	OME PURCHAS	SE			Geogra	aphy: COL0	DRADO 20	003	Eval	uation Perio	d: JANU	ARY 1, 20	003 TO D	ECEMBER	R 31,
	Total Ho Purchase L		_	ncome owers	Moderate Borro			e-Income rowers		Income owers		Ma	arket Sha	are*	
MA/Assessment Area:	#	% of Total* *	% Familie s***	% BANK Loans** **	% BANK Loans1	% BANK Loans**	% Familie s***	% BANK Loans****	% Families* **	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	5	62.50	18.33	0.00	18.86	0.00	23.74	20.00	39.06	80.00	0.01	0.00	0.00	0.00	0.01
Limited Review:		•			•				•		•	•	•	•	
Boulder 2003	3	37.50	19.17	0.00	18.44	0.00	22.67	0.00	39.73	100.00	0.03	0.00	0.00	0.00	0.09
Eagle 2003	0	0.00	8.04	0.00	11.05	0.00	17.26	0.00	63.65	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

## **Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution	-	PROVEM	IENT			Geograp	hy: COLOF	RADO 2003		Evalu	ation Peri	od: JANI	JARY 1,	2003 TO	
	Total Ho Improvemen		_	Income rowers		e-Income owers		Income	'-'	Income		Mar	ket Sha	re*	
MA/Assessment Area:	#	% of Total*		% BANK Loans****	% BANK Loans2	% BANK Loans****		% BANK Loans****		% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver 2003	22	81.48	18.33	0.00	18.86	0.00	23.74	13.64	39.06	86.36	0.35	0.00	0.00	0.16	0.82
Limited Review:	•		·												
Boulder 2003	4	14.81	19.17	0.00	18.44	25.00	22.67	25.00	39.73	50.00	0.74	0.00	0.88	0.64	1.06
Eagle 2003	1	3.70	8.04	0.00	11.05	0.00	17.26	0.00	63.65	100.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. 2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution DECEMBER 31, 200		RTGAG	E REFINAN	ICE			hy: COLOR	ADO 2003		Evaluation	on Period	: JANUA	RY 1, 20	003 TO	
MA/Assessment						e-Income owers		Income	Upper-I Borro			Marl	ket Sha	re*	
Area:	#	% of Total*	% Families ***	% BANK Loans****	% BANK Loans3	% BANK Loans****	% Families* **	% BANK Loans****	% Families*	% BANK Loans**	Overa II	Low	Mod	Mid	Upp
Full Review:		I.						l .	l .						
Denver 2003	7	58.33	18.33	0.00	18.86	0.00	23.74	14.29	39.06	85.71	0.00	0.00	0.00	0.00	0.01
Limited Review:															
Boulder 2003	3	25.00	19.17	0.00	18.44	33.33	22.67	0.00	39.73	66.67	0.01	0.00	0.01	0.00	0.01
Eagle 2003	2	16.67	8.04	0.00	11.05	50.00	17.26	0.00	63.65	50.00	0.04	0.00	0.46	0.00	0.03

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S DECEMBER 31, 2003	MALL LOA	ANS TO I	BUSINESSES		Geograp	hy: COLORADO 2003	Evaluation Pe	riod: JANUARY	1, 2003 TO
	Total Loan Busine	is to	Business Revenues or I	f \$1 million	Loans by	Original Amount Regardles	s of Business Size	Mar	ket Share*
MA/Assessment Area:	#	% of Total*	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:		I							
Denver 2003	983	79.27	61.54	45.88	51.48	25.23	23.30	1.26	1.72
Limited Review:		l							
Boulder 2003	238	19.19	63.45	60.50	56.72	21.43	21.85	1.80	3.03
Eagle 2003	19	1.53	63.75	63.16	63.16	5.26	31.58	1.88	3.29

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.79% of small loans to businesses originated and purchased by the bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: S DECEMBER 31, 2003	MALL LOA	ANS TO F	FARMS		Geography: 0	COLORADO 2003	Evaluation Period	: JANUARY 1,	2003 TO
- ,	Total :		Farms With I	Revenues of or less	Loans by	Original Amount Regardle	ess of Farm Size	Mar	ket Share*
MA/Assessment Area:	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:	•								
Denver 2003	0	0.00	87.78	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:	•				•		-		
Boulder 2003	0	0.00	89.96	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2003	0	0.00	81.88	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

## **Table 1. Lending Volume**

LENDING VOLUME				Geograph	ny: COLORA	ADO 2004		Evaluation	n Period: JAI	NUARY 1, 2	2004 TO DE	CEMBER 31, 2004
	% of Rated Area	Home N	/lortgage	Small L Busin	oans to esses	Small Loar	ns to Farms		nunity ent Loans**		eported ans	% of Rated Area Deposits in MA/AA***
MA/Assessment Area (2004):	Loans (#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Denver 2004	80.98	8	1,418	869	192,680	0	0	8	22,604	877	194,098	80.31
Limited Review:						•	•	•				
Boulder 2004	15.51	1	525	167	29,925	0	0	0	0	168	30,450	16.30
Eagle 2004	3.51	1	37	37	9,296	0	0	0	0	38	9,333	3.39

<sup>\*</sup> Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2004.

\*\*\* Deposit Data as of June 30, 2005. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

## **Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: 31, 2004	HOME PUR	CHASE			Geograp	ohy: COLOF	ADO 2004		Evalua	tion Period	: Januaf	RY 1, 20	004 TO	DECEM	1BER
		Home e Loans		ncome aphies		e-Income aphies		-Income aphies		Income aphies	Marke	et Share	(%) by	Geogra	iphy*
MA/Assessment Area:	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2004	3	100.00	1.89	0.00	21.89	0.00	42.97	33.33	33.26	66.67	0.00	0.00	0.00	0.00	0.00
Limited Review:	•			•				•			•			•	
Boulder 2004	0	0.00	0.27	0.00	19.36	0.00	44.99	0.00	35.39	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	0	0.00	0.00	0.00	0.00	0.00	5.14	0.00	94.86	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans** 

Geographic Distribution: DECEMBER 31, 2004	HOME II	MPROVE	MENT		(	Geography:	COLORADO	2004	ı	Evaluation l	<b>Period</b> : J	ANUARY	′ 1, 2004	то	
MA/Assessment Area:	Total I Improv Loa	ement	Low-Ir Geogra	ncome aphies		e-Income aphies	Middle- Geogr	Income aphies		Income aphies	Maı	rket Shar	e (%) by	Geograp	hy*
	#	% of Total*	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Denver 2004	3	100.0 0	1.89	0.00	21.89	0.00	42.97	66.67	33.26	33.33	0.04	0.00	0.00	0.06	0.04
Limited Review:															
Boulder 2004	0	0.00	0.27	0.00	19.36	0.00	44.99	0.00	35.39	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	0	0.00	0.00	0.00	0.00	0.00	5.14	0.00	94.86	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** 

Geographic Distribution: DECEMBER 31, 2004	HOME I	MORTGA	GE REFINA	ANCE		Geogra	ohy: COLOR	ADO 2004		Evaluation	on Period	<b>:</b> JANU	ARY 1, 2	2004 TO	1
MA/Assessment Area:	Total I Morto Refina Loa	gage ance	Low-Ir Geogra	ncome aphies		e-Income aphies		Income aphies		Income aphies	Mark	et Shar	e (%) by	Geogra	ohy*
	#	% of Total*	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:											·				
Denver 2004	1	50.00	1.89	0.00	21.89	0.00	42.97	100.00	33.26	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:			•						•		l		L. L		
Boulder 2004	0	0.00	0.27	0.00	19.36	0.00	44.99	0.00	35.39	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	1	50.00	0.00	0.00	0.00	0.00	5.14	0.00	94.86	100.00	0.04	0.00	0.00	0.00	0.04

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)
\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans** 

Geographic Distribution 2004	. WULTIF	AIVIIL I			Geogra	phy: COLOF	KADO 2004		⊏valuati	on Period: 、	JANUAK	1,200	4 10 05	CEIVIDE	K 31,
MA/Assessment Area:	Multif	ital amily ans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Mark	et Shar	e (%) by	Geogra	phy*
	#	% of Total**	% of MF Units***	% of MF Units****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:						l .						I			
Denver 2004	1	50.00	8.54	0.00	40.67	100.00	42.00	0.00	8.79	0.00	0.30	0.00	0.67	0.00	0.00
Limited Review:						•						I.			
Boulder 2004	1	50.00	5.73	0.00	38.53	100.00	42.03	0.00	13.71	0.00	2.17	0.00	5.00	0.00	0.00
Eagle 2004	0	0.00	0.00	0.00	0.00	0.00	0.23	0.00	99.77	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribut		DANS TO	) BUSINES	SES		Geogra	aphy: COLC	)RADO 200	)4	Eval	uation Pe	eriod: JAN	IUARY 1,	2004 TO	
,	Total Sr Business		Low-Ir Geogra		Moderate Geogra		Middle- Geogra	Income aphies	Upper- Geogr	Income aphies	Ма	arket Sha	re (%) by	Geograph	าy*
MA/Assessment Area:	#	% of Total*	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp						
Full Review:															
Denver 2004	844	80.53	3.87	3.44	25.14	34.48	37.42	28.44	32.72	33.65	1.03	1.00	1.48	0.82	0.95
Limited Review:									l .						
Boulder 2004	167	15.94	1.36	0.60	31.16	20.36	37.51	46.71	29.95	32.34	1.40	1.01	0.96	1.69	1.50
Eagle 2004	37	3.53	0.00	0.00	0.00	0.00	1.92	0.00	98.08	100.00	2.63	0.00	0.00	0.00	1.59

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

## **Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distributi DECEMBER 31, 2004		NS TO FA	RMS			Geograp	hy: COLO	RADO 200	)4	E	valuatio	n Period	: JANUAF	RY 1, 200	14 TO
		Farm	_	ncome aphies	Moderate Geogra			Income aphies	Upper-lı Geogra		Mai	rket Shar	e (%) by	Geograp	hy*
MA/Assessment Area:	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overa II	Low	Mod	Mid	Upp
full Review:	·														
Denver 2004	0	0.00	1.46	0.00	22.03	0.00	40.76	0.00	35.41	0.00	0.00	0.00	0.00	0.00	0.0
imited Review:			·		•	•									
Boulder 2004	0	0.00	0.00	0.00	21.71	0.00	49.15	0.00	29.15	0.00	0.00	0.00	0.00	0.00	0.0
Eagle 2004	0	0.00	0.00	0.00	0.00	0.00	9.52	0.00	90.48	0.00	0.00	0.00	0.00	0.00	0.0

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### **Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HC 2004	OME PURCHAS	SE			Geogra	aphy: COL0	DRADO 20	004	Eval	uation Perio	d: JANU	ARY 1, 20	004 TO D	ECEMBER	R 31,
	Total Ho Purchase L		_	ncome owers	Moderate Borro			e-Income rowers		Income owers		Ma	arket Sha	are*	
MA/Assessment Area:	#	% of Total*	% Familie s***	% BANK Loans** **	% BANK Loans4	% BANK Loans**	% Familie s***	% BANK Loans****	% Families* **	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
Denver 2004	3	100.00	18.18	0.00	18.74	0.00	23.61	33.33	39.47	66.67	0.00	0.00	0.00	0.00	0.01
Limited Review:		•			•				•	•		•	•	•	
Boulder 2004	0	0.00	19.37	0.00	18.69	0.00	22.31	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	0	0.00	8.04	0.00	11.05	0.00	17.26	0.00	63.65	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>4</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

## **Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution	-	PROVEM	IENT			Geograp	hy: COLOF	RADO 2004		Evalu	ation Peri	od: JANI	JARY 1,	2004 TO	
·	Total Ho Improvemen		_	Income rowers		e-Income owers		Income		Income		Mar	ket Sha	re*	
MA/Assessment Area:	#	% of Total*		% BANK Loans****	% BANK Loans5	% BANK Loans****	% Families*	% BANK Loans****		% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver 2004	1	100.00	18.18	0.00	18.74	0.00	23.61	0.00	39.47	100.00	0.01	0.00	0.00	0.00	0.04
Limited Review:			·				•							"	
Boulder 2004	0	0.00	19.37	0.00	18.69	0.00	22.31	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	0	0.00	8.04	0.00	11.05	0.00	17.26	0.00	63.65	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. 5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution DECEMBER 31, 200		RTGAG	E REFINAN	ICE			hy: COLOR	ADO 2004		Evaluation	on Period	: JANUA	RY 1, 20	004 TO	
MA/Assessment	Mortgage Re					e-Income owers		Income	Upper-I Borro			Mark	ket Sha	re*	
Area:	#		Families	% BANK Loans****	% BANK Loans6	% BANK Loans****	% Families* **	% BANK Loans****	% Families*	% BANK Loans**	Overa II	Low	Mod	Mid	Upp
Full Review:		I.	l .					l .	l .						
Denver 2004	1	50.00	18.18	0.00	18.74	0.00	23.61	0.00	39.47	100.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Boulder 2004	0	0.00	19.37	0.00	18.69	0.00	22.31	0.00	39.63	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	1	50.00	8.04	0.00	11.05	0.00	17.26	100.00	63.65	0.00	0.05	0.00	0.00	0.40	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area. 6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S DECEMBER 31, 2004	MALL LOA	ANS TO E	BUSINESSES		Geograpl	ny: COLORADO 2004	Evaluation Pe	riod: JANUARY	1, 2004 TO
·	Total Loan Busine	is to	Business Revenues or I	of \$1 million	Loans by 0	Original Amount Regardles	s of Business Size	Mar	ket Share*
MA/Assessment Area:	#	% of Total*	% of Businesses	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:		I			<u>l</u>				
Denver 2004	869	80.99	62.71	46.72	47.64	25.43	26.93	1.03	1.41
Limited Review:		•							
Boulder 2004	167	15.56	64.54	59.88	55.09	25.15	19.76	1.40	2.31
Eagle 2004	37	3.45	66.40	37.84	43.24	10.81	45.95	2.63	3.68

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.96% of small loans to businesses originated and purchased by the bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: S DECEMBER 31, 2004	MALL LOA	ANS TO F	FARMS		Geography: C	COLORADO 2004	Evaluation Period	I: JANUARY 1,	2004 TO
	Total 3		Farms With \$1 million	Revenues of or less	Loans by	Original Amount Regardle	ss of Farm Size	Mar	ket Share*
MA/Assessment Area:	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:	'					<u> </u>			
Denver 2004	0	0.00	86.31	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:					1	•	1		
Boulder 2004	0	0.00	88.22	0.00	0.00	0.00	0.00	0.00	0.00
Eagle 2004	0	0.00	84.35	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTME	NTS		Geogr	aphy: COLORADO	2004	Evaluation Perio	od: JANUARY 1	, 2003 TO AUG	UST 22, 2005	
MA/Assessment Area:	Prior Perio	d Investments*	Current Perio	od Investments		Total Investments		Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:							l			
Denver 2004	5	1,648	3	1,026	8	2,674	86.57	3	4,424	
Limited Review:										
Boulder 2004	3	164	3	208	6	372	12.04	3	898	
Eagle 2004	0	0	3	43	3	43	1.39	3	187	

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

# Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BR JANUARY 1, 2003 TO A	_		SYSTEM	AND BRA	ANCH OF	PENINGS	S/CLOSI	NGS	Geo	graphy: C	OLORAI	00 2004		Εν	/aluation	Period:	
	Deposi ts			Branc	hes				Branc	h Openii	ngs/Closi	ngs			Popu	lation	
MA/Assessment Area:  % of # of % of Location of Branche Rated BANK Rated Income of Geographi Area Branch Area  Proposition of Branche Reposition of Branche Reposition of Branche Reposition of Branche Reposition of Branche								# of Branch	# of Branch	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
	Deposi ts in AA	es	Branch es in AA	Low	Mod	Mid	Upp	Openin gs	Closin gs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver 2004	80.31	7	63.64	0.00	42.86	28.57	28.57	1	0	0	1	0	0	4.56	27.71	40.28	27.32
Limited Review:		•						•	•				•	•			
Boulder 2004	16.30	3	27.27	0.00	33.33	33.33	33.33	1	0	0	0	0	1	3.35	25.38	41.56	29.70
Eagle 2004	3.39	1	9.09	0.00	0.00	0.00	100.0 0	0	0	0	0	0	0	0.00	0.00	5.66	94.34

# **Distribution of Branch and ATM Delivery System**

Distribution of Branch ar 2005	nd ATM De	elivery Sys	tem			Geogra	ohy: COL	ORADO 2	2004		Evalua	tion Peri	od: JANI	JARY 1, 2	2003 TO	AUGUST	22,
	Deposi ts			Brancl	hes					ATM	1s				Popu	lation	
MA/Assessment Area:  % of # of % Total Bank T					ation of l			#of Bank	% of Location of ATMs by Income of Total Geographies  Bank				ome of	% of Population within Each Geography			
	Bank Brand Deposi es ts	Branch es	Bank Branch es	Low	Mod	Mid	Upp	ATMs	Bank ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver 2004	80.31	7	63.64	0	43	29	29	1	33.33	0	0	0	1	4.56	27.71	40.28	27.32
Limited Review:								•									
Boulder 2004	16.30	3	27.27	0	33	33	33	1	33.33	0	1	0	0	3.35	25.38	41.56	29.70
Eagle 2004	3.39	1	9.09	0	0	0	100	1	33.33	0	0	0	1	0.00	0.00	5.66	94.34

## **Table 1. Lending Volume**

LENDING VOLUME				Geograph	ny: ARIZON	A 2003	E	Evaluation P	eriod: JANU	ARY 1, 200	3 TO DECE	MBER 31, 2003
	% of Rated Area	Home M	/lortgage	Small L Busin	oans to esses	Small Loar	ns to Farms		nunity ent Loans**	Total Ro	•	% of Rated Area Deposits in MA/AA***
MA/Assessment Area (2004):	Loans (#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Maricopa 2003	100.00	27	5,036	266	61,832	0	0	0	0	293	66,868	100.00

<sup>\*</sup> Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* Community Development loans were not evaluated for this reporting period.

\*\*\* Deposit Data as of June 30, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

### **Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: 2003	HOME PUR	CHASE			Geograp	ohy: ARIZOI	NA 2003		Evaluation	n Period: J/	ANUARY	1, 2003	TO DE	CEMBE	ER 31,
		Home e Loans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Marke	t Share	(%) by	Geogra	ıphy*
MA/Assessment Area:	# % of		% Owner Occ Units****	% % BANK Owner Occ Units***		% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
Full Review:	Full Review:														
Maricopa 2003	14	100.00	1.53	0.00	21.47	0.00	40.34	7.14	36.66	92.86	0.01	0.00	0.00	0.00	0.02

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

## **Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: 31, 2003	HOME I	MPROVE	MENT		(	Geography:	ARIZONA 2	Eva	aluation Per	riod: JAN	IUARY 1,	2003 TC	DECEN	/IBER	
MA/Assessment Area:						e-Income aphies	Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Ge			Geograp	hy*
	#	% of Total* *	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2003	6	100.0 0	1.53	0.00	21.47	0.00	40.34	0.00	36.66	100.00	0.06	0.00	0.00	0.00	0.16

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** 

Geographic Distribution: DECEMBER 31, 2003	HOME N	MORTGA	GE REFINA	ANCE		Geogra	Evaluation	Period: JANUARY 1, 2003 TO							
MA/Assessment Area:	Total I Morto Refina Loa	jage ance		ncome aphies				Income aphies		Income aphies	Market Share (%) by Geography*				phy*
			% Owner Occ Units***	Occ Loans		% BANK Loans	% Owner   % BANK Occ   Loans Units***		Overa II	Low	Mod	Mid	Upp		
Full Review:	Full Review:														
Maricopa 2003	6	100.0 0	1.53	0.00	21.47	16.67	40.34	16.67	36.66	66.67	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)
\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

## **Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: 2003	MULTIF	AMILY			Geogra	phy: ARIZOI	NA 2003		Evaluation	Period: JAN	NUARY 1	, 2003 T	O DECE	MBER (	31,
MA/Assessment Area:						e-Income aphies		Income aphies	Upper- Geogr	Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% of MF Units****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2003	1	100.0 0	6.97	0.00	40.88	100.00	36.33	0.00	15.82	0.00	0.26	0.00	0.45	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution DECEMBER 31, 2003		OANS TO	BUSINES	SES		Geogra	aphy: ARIZ(	DNA 2003		Evalua	tion Perio	od: JANUA	ARY 1, 20	03 TO	
	Total S Business		Low-Ir Geogra	ncome aphies	Moderate Geogra		Middle- Geogra	Income aphies		Income aphies	Market Share (%) by Geography*				
MA/Assessment Area:	#	# % of % of %		% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp	
Full Review:	ull Review:														
Maricopa 2003	Maricopa 2003 266 100.00 6.32 8.65					31.58	31.82	24.81	36.20	34.96	0.28	0.54	0.41	0.25	0.25

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distributio DECEMBER 31, 2003		NS TO FA	RMS			Geograp	ohy: ARIZO	DNA 2003		Eva	luation P	<b>Period</b> : JA	NUARY	1, 2003 7	ГО
	Total Small Loans		_	ncome aphies	Moderate- Geogra			Income aphies	Upper-li Geogra		Mai	rket Shar	e (%) by	Geograp	hy*
MA/Assessment Area:	#	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overa II	Low	Mod	Mid	Upp		
Full Review:															
Maricopa 2003	0	0.00	2.64	0.00	21.14	0.00	39.05	0.00	37.09	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### **Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HC	OME PURCHAS	SE			Geogra	aphy: ARIZ	ONA 2003		Evaluat	tion Period:	JANUAR	Y 1, 2003	TO DEC	EMBER 3	1, 2003
	Total Ho Purchase I			ncome owers	Moderate Borro			-Income owers		Income		Ma	arket Sh	are*	
MA/Assessment Area:	Purchase Loans Borrowe  # % of % Total* Familie E * * **** Loans**					% BANK Loans**	% Familie s***	% BANK Loans****	% Families* **	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2003	2	100.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	100.00	0.01	0.00	0.00	0.00	0.02

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>7</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### **Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution DECEMBER 31, 200	_	PROVEM	IENT			Geograp	ohy: ARIZO	NA 2003		Evaluati	on Period	: JANUAI	RY 1, 20	03 TO	
						e-Income owers		Income owers	'-'	Income owers		Mar	ket Sha	re*	
MA/Assessment Area:	Total* Famili Loans*					% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2003	6	100.00	19.09	0.00	18.51	16.67	21.75	0.00	40.65	83.33	0.07	0.00	0.06	0.00	0.13

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. 8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution DECEMBER 31, 20		ORTGAG	E REFINAN	ICE		Geograp	hy: ARIZON	A 2003	E	Evaluation	Period: J	IANUARY	′ 1, 2003	то	
MA/Assessment	Total Ho Mortgage Re Loans	finance	_	ncome owers		e-Income owers		Income owers	Upper-I Borro			Marl	ket Sha	re*	
Area:	#	% of Total*	% Families	% BANK Loans****	% BANK Loans9	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans** **	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2003	6	100.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	100.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Western)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>9</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S DECEMBER 31, 2003	MALL LO	ANS TO I	BUSINESSES		Geograp	hy: ARIZONA 2003	Evaluation Perio	<b>d</b> : JANUARY 1,	2003 TO
	Total Loan Busine		Business Revenues o or I	f \$1 million	Loans by	Original Amount Regardles	ss of Business Size	Mar	ket Share*
MA/Assessment Area:	#	% of Total*	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Maricopa 2003	266	100.0 0	61.95	40.98	46.62	22.56	30.83	0.28	0.34

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.52% of small loans to businesses originated and purchased by the bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: S 31, 2003	MALL LO	ANS TO F	FARMS		Geography:	ARIZONA 2003	Evaluation Period: J	IANUARY 1, 200	03 TO DECEMBER
		Small Farms		Revenues of or less	Loans b	y Original Amount Regardl	ess of Farm Size	Mar	ket Share*
MA/Assessment Area:	Loans to Farms \$1 million or less				\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Maricopa 2003	0	0.00	81.58	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

### **Table 1. Lending Volume**

LENDING VOLUME				Geograp	ny: ARIZON	A 2004	E	Evaluation P	<b>Period</b> : JANU	ARY 1, 200	4 TO DECE	MBER 31, 2004
	% of Rated Area	Home N	/lortgage		oans to	Small Loar	ns to Farms		nunity ent Loans**		eported ans	% of Rated Area Deposits in MA/AA***
MA/Assessment Area (2004):	Loans (#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Maricopa 2004	100.00	1	300	350	89,473	0	0	2	4,888	351	89,773	100.00

<sup>\*</sup> Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2004 to December 31, 2004.

\*\*\* Deposit Data as of June 30, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

### **Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: 2004	HOME PUR	CHASE			Geograp	ohy: ARIZON	NA 2004		Evaluation	n Period: J/	ANUARY	1, 2004	TO DE	CEMBE	ER 31,
		Home e Loans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Marke	t Share	(%) by	Geogra	ıphy*
MA/Assessment Area:	#	% of Total**	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:											_				
Maricopa 2004	0	0.00	1.53	0.00	21.47	0.00	40.34	0.00	36.66	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### **Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: 31, 2004	HOME I	MPROVE	MENT		(	Geography:	ARIZONA 2	004	Eva	aluation Per	iod: JAN	UARY 1,	2004 TC	DECEN	/IBER
MA/Assessment Area:	Total I Improv Loa	ement		ncome aphies		e-Income aphies		Income aphies		Income aphies	Mai	rket Shar	e (%) by	Geograp	hy*
	#	% of Total* *	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	1.53	0.00	21.47	0.00	40.34	0.00	36.66	0.00	0.00	0.00	0.00	0.00	0.0

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** 

Geographic Distribution: DECEMBER 31, 2004			GE KEFINA	ANCE			ohy: ARIZON			Evaluation					
MA/Assessment Area:	Total I Morto Refina Loa	jage ance	Low-Ir Geogra			e-Income aphies	Middle- Geogr			Income aphies	Mark	et Shar	e (%) by	Geogra	phy*
	#	% of Total*	% Owner Occ Units***	% Owner Occ Units****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	1.53	0.00	21.47	0.00	40.34	0.00	36.66	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)
\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans** 

Geographic Distribution: 2004	MULTIF	AMILY			Geogra	phy: ARIZO	NA 2004		Evaluation	Period: JAN	NUARY 1	, 2004 T	O DECE	EMBER (	31,
MA/Assessment Area:	Multif	ital amily ans		ncome aphies		e-Income aphies		Income aphies		Income aphies	Mark	et Shar	e (%) by	Geogra	phy*
	#	% of Total**	% of MF Units***	% of MF Units****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	1	100.0 0	6.97	0.00	40.88	0.00	36.33	100.00	15.82	0.00	0.19	0.00	0.00	0.79	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

### Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution DECEMBER 31, 2004		OANS TO	BUSINES	SES		Geogra	aphy: ARIZ(	DNA 2004		Evalua	tion Perio	od: JANUA	ARY 1, 20	04 TO	
	Total S Business		Low-Ir Geogr	ncome aphies	Moderate Geogra		Middle- Geogr	Income aphies		Income aphies	Ма	rket Shai	re (%) by	Geograph	ıy*
MA/Assessment Area:	#	% of Total*	% of Busines ses***	% BANK Loans	Overal I	Low	Mod	Mid	Upp						
Full Review:															
Maricopa 2004	350	100.00	6.18	12.86	25.40	27.14	31.67	25.14	36.69	34.86	0.37	0.96	0.46	0.31	0.31

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution DECEMBER 31, 2004	n: SMALL LOA	NS TO FA	RMS		Geography: ARIZONA 2004 Evaluation Period: JANUARY 1, 2004 TO										
	Total Small Loans		_	ncome aphies	Moderate Geogra			Income aphies	Upper-Ii Geogra		Mai	rket Shar	e (%) by	Geograp	hy*
MA/Assessment Area:	# % of Total**		% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	2.48	0.00	21.58	0.00	38.18	0.00	37.72	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

### **Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HC	OME PURCHAS	SE			Geogr	aphy: ARIZ	ONA 2004		Evaluat	ion Period:	JANUAR	Y 1, 2004	1 TO DEC	EMBER 3	1, 2004
				ncome owers		derate-Income Borrowers		Middle-Income Borrowers		Income owers	Market Share*				
MA/Assessment Area:	# % of Total*		% Familie s***	% BANK Loans** **	% BANK Loans 10	% BANK Loans**	% Familie s***	% BANK Loans****	% Families* **	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area. 10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### **Table 9. Borrower Distribution of Home Improvement Loans**

					•							)			
Borrower Distribution DECEMBER 31, 200	-	PROVEM	IENT			Geograp	hy: ARIZO	NA 2004		Evaluati	on Period	: JANUA	RY 1, 20	04 TO	
	Total Home Low-Income Improvement Loans Borrowers							Income owers	• • •	Income owers	Market Share*				
MA/Assessment Area:	#	% of Total*		% BANK Loans****		% BANK Loans****	% Families*	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	19.09	0.00	18.51	0.00	21.75	0.00	40.65	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>11</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution DECEMBER 31, 20		ORTGAG	E REFINAN	ICE		Geography: ARIZONA 2004 Evaluation Period: JANUARY 1, 2004 TO									
MA/Assessment				ncome owers	Moderate Borro	e-Income owers		Income	Upper-I Borro		Market Share*				
Area:	# % of %		Families	% BANK Loans****	% BANK Loans12	% BANK Loans****	% Families* **	% BANK Loans****	% Families*	% BANK Loans** **	Overa II	Low	Mod	Mid	Upp
Full Review:															
Maricopa 2004	0	0.00	19.09	0.00	18.51	0.00	21.75 0.00		40.65 0.00		0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2004 Peer Mortgage Data (Western)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>12</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

### Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S DECEMBER 31, 2004	MALL LO	ANS TO E	BUSINESSES		Geograp	hy: ARIZONA 2004	Evaluation Perio	od: JANUARY 1, 2004 TO				
	Loan		Business Revenues o or I	f \$1 million	Loans by	Original Amount Regardles	s of Business Size	Mar	ket Share*			
MA/Assessment Area:	Businesses # % of Total*		% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less			
Full Review:												
Maricopa 2004	350 100.0 62.67 34.00 0		39.14	28.29	32.57	0.35						

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.57% of small loans to businesses originated and purchased by the bank.

### Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: S 31, 2004	MALL LO	ANS TO F	ARMS		Geography:	ARIZONA 2004	Evaluation Period: .	: JANUARY 1, 2004 TO DECEMBER					
	Total Loans to	Small Farms	Farms With \$1 million	Revenues of or less	Loans b	y Original Amount Regardle	ess of Farm Size	Market Share*					
MA/Assessment Area:	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less				
Full Review:													
Maricopa 2004	0	0.00	79.23	0.00	0.00	0.00	0.00	0.00	0.00				

<sup>\*</sup> Based on 2004 Peer Small Business Data -- US and PR

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2004).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

### **Table 14. Qualified Investments**

QUALIFIED INVESTME	NTS		Geogr	aphy: ARIZONA 20	004	Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 20								
MA/Assessment Area:				od Investments		Total Investments		Unfunded Co	Commitments**					
	# \$(000's)		#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)					
Full Review:														
Maricopa 2004	3	1,195	5	1,238	8	2,433	100.00	3	1,305					

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

# Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BR 1, 2004 TO DECEMBER	-		SYSTEM /	AND BRA	ANCH OF	PENINGS	S/CLOSI	NGS	Geog	graphy: A	RIZONA	2004		Evalu	uation Pe	eriod: JAN	NUARY
	Deposi ts			Brancl	nes				Branc	h Openir	ngs/Closi	ngs			Popul	lation	
MA/Assessment Area:	% of Rated Area	# of BANK Branch	% of Rated Area		ation of E			# of Branch	# of Branch	Net	change i Bran (+ c		n of	% of Population within Each Geography			
	Deposi ts in AA	es	Branch es in AA	Low	Mod	Mid	Upp	Openin gs	Closin gs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Maricopa 2004	100.00	7	100.00	0.00	28.57	14.29	57.14	4	0	0	0	1	3	4.88	28.69	36.78	29.64

# **Distribution of Branch and ATM Delivery System**

Distribution of Branch ar 2004	nd ATM De	elivery Sys	tem			Geogra	phy: ARI	ZONA 200	4	E	Evaluatio	n Period	: JANUAI	RY 1, 200	04 TO DE	CEMBER	31,
	Deposi ts			Brancl	nes					ATM	1s				Popu	lation	
MA/Assessment Area:	% of Total	# of Bank	% of Total			Branches ographie	•	#of Bank	% of Total	Location		As by Inco	ome of	% of Population within Each Geography			
	Bank Deposi ts	Branch es	Bank Branch es	Low	Mod	Mid	Upp	ATMs	Bank ATMs	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Maricopa 2004	100.00	7	100.00	0	29	14	57	1	100.00	0	1	0	0	4.88	28.69	36.78	29.64