



## **PUBLIC DISCLOSURE**

January 23, 2006

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**GUARANTY BANK AND TRUST COMPANY  
RSSD# 666657**

**1331 SEVENTEENTH STREET  
DENVER, COLORADO 80202**

**Federal Reserve Bank of Kansas City  
925 Grand Boulevard  
Kansas City, Missouri 64198**

**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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **GENERAL INFORMATION**

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of each examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community and rate its CRA performance consistent with the provisions set forth in 12 CFR Part 228, Appendix A.

This document is an evaluation of the CRA performance of Guaranty Bank & Trust Company, Denver, Colorado, as of January 23, 2006, prepared by the Federal Reserve Bank of Kansas City (Reserve Bank), the institution's supervisory agency.

Definitions for many of the terms used in this performance evaluation can be found in Section 228.12 of Regulation BB. For additional convenience, a glossary of common CRA terms is attached at the end of this performance evaluation as Appendix B.

## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** Guaranty Bank & Trust Company is rated "Satisfactory."

The following table indicates the performance level of Guaranty Bank and Trust Company with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	GUARANTY BANK & TRUST COMPANY		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

- The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the institution's rating include:

Lending Test:

- Good responsiveness in meeting the credit demands of the delineated assessment areas;
- An adequate proportion of loans originated inside the assessment areas;
- A good distribution of loans among low- and moderate-income geographies and individuals, and among small-revenue businesses; and,
- An excellent record of granting community development loans to provide affordable housing to low- and moderate-income individuals and to revitalize or stabilize low- and moderate-income geographies.

#### Investment Test:

- The bank made an adequate level of qualified community development investments, grants, and donations, although rarely in a leadership position;
- The bank exhibited adequate responsiveness to credit and community development needs; and,
- The bank rarely made innovative or complex investments to support community development initiatives.

#### Service Test:

- Reasonable access of retail banking systems to geographies and individuals of varying income levels;
- The record of opening and closing branches resulted in slight improvement in access to moderate-income geographies;
- Services did not vary in a way that inconvenienced certain portions of the assessment area, particularly low- and moderate-income geographies; and,
- Limited involvement in providing financial, managerial, and fundraising expertise to community service organizations.

## **INSTITUTION**

### **DESCRIPTION OF INSTITUTION**

Guaranty Bank and Trust Company, headquartered in downtown Denver, Colorado, operates 19 full-service locations and one mortgage loan production office in the Denver and Boulder Metropolitan Statistical Areas (MSAs). The bank expanded from 9 to 19 locations after being acquired in August 2004 by Centennial Bank Holdings, Inc., a Denver-based multibank holding company. Assessment areas served by the bank are the Denver/Weld County assessment area – comprised of seven counties in the Denver MSA and a portion of Weld County north of Denver – and a second assessment area comprised of the entire Boulder MSA northwest of Denver. Seventeen of the banking offices are located in the Denver MSA: two in moderate-income tracts and the rest in middle- and upper-income tracts. The two banking offices in the Boulder MSA are located in moderate- and middle-income tracts.

The bank offers a full range of deposit and credit products, a network of cash-dispensing and deposit-taking automated teller machines (ATMs), and 24-hour telephone and Internet banking services.

As of September 30, 2005, the bank reported total assets of \$1.669 billion, total deposits of \$1.210 billion, and gross loans of \$1.134 billion. As shown in the table below, the primary lending emphasis was on commercial, commercial real estate, and construction and land development loans, which accounted for 81 percent of gross loans. The bank did no agricultural lending until April 2005, when it acquired the First National Bank of Strasburg in the rural eastern portion of the Denver MSA. Late in 2004, the bank also reorganized its direct and secondary market mortgage functions. The reorganization caused a significant decline in mortgage loan originations reportable under the Home Mortgage Disclosure Act (HMDA) during 2005. Future mortgage loan activity is expected to increase to near former levels.

**EXHIBIT 1**  
**GUARANTY BANK AND TRUST COMPANY**  
**As of September 30, 2005**

Loan Type	Amount \$('000s)	PERCENT
Commercial	248,812	21.9
Real Estate	861,106	76.0
	Amount (\$000s)	Percent
Secured by non-farm, non-residential properties	297,118	34.5
Construction and land development	378,121	43.9
Secured by 1 - to 4-family residential properties	142,046	16.5
Secured by multifamily residential properties	15,970	1.9
Farm land	27,851	3.2
Agricultural	8,995	0.8
Consumer	8,347	0.7
Other	6,534	0.6
<b>GROSS LOANS</b>	<b>1,133,794</b>	<b>100.0</b>

The analysis of CRA performance identified no legal impediments to the bank's ability to lend. In both Denver and Boulder, however, numerous financial institutions offered significant competition for loans.

The bank received a Satisfactory rating at its prior CRA evaluation conducted by the Federal Deposit Insurance Corporation as of July 26, 2004.

### **SCOPE OF EXAMINATION**

The bank's CRA performance was reviewed using the Federal Financial Institutions' Examination Council's (FFIEC) *Interagency CRA Procedures for Large Institutions*. Loan products evaluated included all residential real estate loans reported on the HMDA Loan/Application Register (LAR), including home purchase, refinance, home improvement, and multifamily property loans; all small business loans reported on the CRA LAR; and all loans meeting the definition of "community development" lending under the CRA and its supplementary guidance. The evaluation covered the period since the last examination dated July 26, 2004.

The lending test evaluation included a review of the bank's 2004 and 2005 CRA and HMDA LAR loan data. All HMDA and CRA loans for 2004 were reviewed, while for 2005, HMDA and CRA loans through June 30, 2005 were reviewed. The investment and service tests considered all investments, grants, and contributions made and community service activities conducted since the prior examination. A comparative review of the bank with other commercial banks operating within its assessment areas was performed. More specifically, the review included a comparison of the bank's lending performance to the 2004 aggregate lending performance of all other financial institutions that report HMDA and CRA loan data within the bank's assessment areas

(referred to as aggregate data). Bank data for 2005 was analyzed and included in the analysis; however, aggregate data for 2005 was not yet available.

For the evaluation of the geographic distribution of loans, geographies were classified on the basis of 2000 Census data. The bank's performance was rated based on its penetration in all geographies, particularly low- and moderate-income geographies. For the evaluation of borrower characteristics, borrower income levels were based on 2004 and 2005 estimated median-family income (MFI) from the U.S. Department of Housing and Urban Development (HUD). The performance was rated based on penetration to all individual income categories, particularly low- and moderate-income individuals.

The Denver/Weld County assessment area accounted for a substantial majority of the bank's lending and community development activities, and significantly influenced the overall summary of CRA performance. The Boulder MSA assessment area accounted for only about 7 percent of mortgage and small business loan originations and received a limited review. Performance under the lending, investment, and service tests in the Boulder MSA was consistent with performance in the Denver/Weld County assessment area, and did not appreciably affect overall ratings.

Interviews with members of the communities within the bank's assessment areas were conducted during the examination to ascertain the credit needs of the communities, the availability of community development investment opportunities, and local economic conditions. Additional community contacts previously conducted in the Denver metropolitan area by this Reserve Bank and other regulatory agencies were also referenced. Community contacts included representatives from local businesses, real estate agencies, city government, housing authorities, and economic development agencies. Additional scoping information is provided in the tables in Appendix A.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Overall conclusions regarding the lending, investment, and service tests are summarized in the following sections. Each test is evaluated for performance characteristics described in Appendix B of Regulation BB, which implements the CRA. Data used for this evaluation included the bank's performance data, aggregate lending data from each assessment area (see CRA Core Tables in Appendix C of this evaluation), and area demographic information.

### **LENDING TEST**

The bank demonstrated **High Satisfactory** performance in meeting the credit needs of its delineated assessment areas. The evaluation of home mortgage and small business loans found an adequate proportion originated inside the assessment areas, with a good distribution of loans among low- and moderate-income geographies and individuals, and among small-revenue businesses. The volume of direct and secondary market lending activity indicated reasonable performance in meeting credit demand for

mortgage and small business loans. The bank also continued to demonstrate excellent performance in making community development loans to provide affordable housing for low- and moderate-income individuals and to revitalize or stabilize low- and moderate-income census tracts.

### **Lending Activity:**

The bank demonstrated good responsiveness to area credit needs through small business loans and loans to consumers for home purchase, home refinance, and home improvement as noted in Exhibit 2. In 2004 and the first half of 2005, the bank reported 2,825 mortgage loans totaling \$509.6 million and 1,723 small business loans totaling \$352.0 million. Much of the mortgage loan activity occurred in 2004, prior to the reorganization of the bank's direct and secondary-market mortgage functions. The bank also participated in programs specifically targeted to meet the credit needs of small businesses and low- and moderate-income consumers. These included Small Business Administration (SBA) guaranteed loans for small businesses, and Colorado Housing Finance Authority (CHFA) loans for low- and moderate-income Colorado borrowers whose incomes do not otherwise qualify for residential mortgage loans. Since the prior examination, the bank originated \$18.1 million in SBA loans and \$1.5 million in CHFA loans. The bank plans to initiate other programs including a mortgage lending program targeted to first-time home buyers.

<b>EXHIBIT 2 SUMMARY OF LENDING ACTIVITY</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$('000s)</b>	<b>%</b>
HMDA home purchase	1,546	33.5	282,890	32.6
HMDA refinancings	991	21.5	206,236	23.8
HMDA home improvement	286	6.2	19,315	22.2
HMDA multifamily	2	0.0	1,208	0.1
<b>Total HMDA-related</b>	<b>2,825</b>	<b>61.2</b>	<b>509,649</b>	<b>58.7</b>
<b>Total small business</b>	<b>1,723</b>	<b>37.4</b>	<b>351,970</b>	<b>40.5</b>
<b>Total small farm</b>	<b>64</b>	<b>1.4</b>	<b>6,617</b>	<b>0.8</b>
<b>TOTAL LOANS</b>	<b>4,612</b>	<b>100.0</b>	<b>868,236</b>	<b>100.0</b>

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

### **Assessment Area Concentration:**

Exhibit 3 below shows that of 4,612 home mortgage, small business, and small farm loans reported in 2004 and the first half of 2005, an adequate percentage (65 percent) originated inside the combined assessment areas. By product type, a substantial majority (96 percent) of small business loans were inside the assessment areas, compared with less than half of HMDA-reported mortgage loans. The latter resulted because a majority of home purchase loans, many of them for subsequent resale to the secondary market, fell outside the assessment areas. This activity peaked in 2004, and

declined substantially in 2005 with rising interest rates and reorganization of the bank's mortgage function.

<b>EXHIBIT 3 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA</b>									
	<b>Inside</b>				<b>Outside</b>				
	<b>#</b>	<b>%</b>	<b>\$(‘000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(‘000s)</b>	<b>%</b>	
HMDA home	479	31.0	101,450	35.9	1,067	69.0	181,440	64.1	
HMDA refinancings	636	64.2	135,725	65.8	355	35.8	70,511	34.2	
HMDA home	178	62.2	11,351	58.8	108	37.8	7,964	41.2	
HMDA multifamily	2	100	1,208	100	0	0	0	0.0	
<b>Total HMDA-related</b>	<b>1,295</b>	<b>45.8</b>	<b>249,734</b>	<b>49.0</b>	<b>1,530</b>	<b>54.2</b>	<b>259,915</b>	<b>51.0</b>	
<b>Total small business</b>	<b>1,657</b>	<b>96.2</b>	<b>333,017</b>	<b>94.6</b>	<b>66</b>	<b>3.8</b>	<b>18,953</b>	<b>5.4</b>	
<b>Total small farm</b>	<b>54</b>	<b>84.4</b>	<b>5,780</b>	<b>87.4</b>	<b>10</b>	<b>15.6</b>	<b>837</b>	<b>12.6</b>	
<b>TOTAL</b>	<b>3,006</b>	<b>65.2</b>	<b>588,531</b>	<b>67.8</b>	<b>1,606</b>	<b>34.8</b>	<b>279,705</b>	<b>32.2</b>	

Note: Affiliate loans not included.

### **Geographic and Borrower Distribution:**

The bank demonstrated a good distribution of home mortgage and small business loans in low- and moderate-income tracts and among low- and moderate-income borrowers and small-revenue businesses. The distributions compared reasonably with the demographic composition of the assessment areas and the aggregate performance of other lenders. (Please refer to the Core Tables in Appendix B of this evaluation for bank and aggregate peer data for each assessment area).

### **Community Development Lending:**

The bank demonstrated an excellent record of granting community development loans within the Denver/Weld County and Boulder MSA assessment areas. In 2004 and 2005, the bank originated or renewed 17 community development loans totaling \$40.6 million, or 2 percent of gross loans as of September 30, 2005. Community development loans include loans that have community development as their primary purpose, and have not been reported as home mortgage loans under the HMDA or as small business loans under the CRA. An exception is granted for multifamily dwelling loans, which may qualify as both community development loans and home mortgage loans.

### **INVESTMENT TEST**

The investment performance rating of **Low Satisfactory** reflected an adequate level of qualified investments and donations targeted to activities that promote community

development. Investments and donations accounted for 0.3 percent of total assets as of September 30, 2005, compared with 0.5 percent of total assets at the prior examination. During the current review period, the bank purchased \$4.3 million in CRA-qualified investments, consisting of three pools of mortgage loans to low- and moderate-income individuals residing in the Denver/Weld County and Boulder MSA assessment areas. It also donated \$50,152 to various community service organizations. Due to restructuring of the investment portfolio following the bank's acquisition by Centennial Bank Holdings, Inc., qualifying investments purchased in prior periods had been sold. In comparison, at the previous examination, purchases of qualified investments totaled \$2.2 million, with another \$3.2 million in qualified investment balances carried over from prior periods. Donations to community service organizations totaled \$89,450.

## **SERVICE TEST**

The bank demonstrated **Low Satisfactory** performance in delivering retail banking services and providing community development services within the Denver/Weld County and Boulder MSA assessment areas. Delivery systems were reasonably accessible to geographies and individuals of different income levels. Within the context of the current distribution of branches, the record of opening and closing branches saw slight improvement in access to moderate-income geographies. Services, including hours of operation, did not vary in a way that inconvenienced the assessment area, including low- and moderate-income geographies and individuals. Recent ownership and personnel changes, however, limited the bank's involvement in providing financial, managerial, and fundraising expertise to community service organizations.

## **COMPLIANCE WITH ANTIDISCRIMINATION LAWS**

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the antidiscrimination provisions of the Equal Credit Opportunity Act. The FFIEC Interagency Fair Lending Examination Procedures were used for the analysis. No violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Satisfactory policies, procedures, and training programs have been developed to prevent discriminatory lending practices. Further, the bank was not engaged in any other illegal credit practices inconsistent with helping to meet community credit needs.

## **METROPOLITAN ASSESSMENT AREA CONCLUSIONS**

### **Full-Review**

#### **DENVER/WELD COUNTY**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DENVER/WELD COUNTY ASSESSMENT AREA**

The Denver/Weld County Assessment Area is comprised of Adams, Arapahoe, Broomfield, Denver, Douglas, Elbert, and Jefferson counties in the Denver, Colorado, MSA, and 7 census tracts (out of a total of 37) in rural portions of southern and eastern Weld County, Colorado. The assessment area contained 17 of the 19 banking offices and accounted for a substantial part of the bank's overall lending and deposit-taking activities.

Based on 2000 Census data, the assessment area had a total population of 2,193,783, largely concentrated in Denver, Jefferson, and Arapahoe counties. As shown in Exhibit 4, nearly 29 percent of family households lived in low- or moderate-income tracts. For the assessment area as a whole, 37 percent of families were considered low- or moderate-income, including almost 6 percent who lived below the poverty threshold.

Sixty-four percent of housing in the assessment area was owner-occupied in 2000. Over 75 percent of owner-occupied housing was in middle- and upper-income tracts. Rates of owner-occupancy were also highest in middle- and upper-income tracts, while rental units were the dominant form of housing in low-income tracts and nearly half of housing in moderate-income tracts.

As reported by Dun & Bradstreet in 2000, 88 percent of all businesses in the assessment area reported gross annual revenues of \$1 million or less. Twenty-nine percent of the businesses were located in low- and moderate-income tracts, consistent with population distribution patterns.

Members of the community interviewed during this examination expressed cautious optimism about economic conditions, citing a return to pre-9/11 levels of employment and expanding job opportunities in the service and high technology sectors. Increasing demands for labor are encouraging migration of workers into the Denver MSA both for jobs requiring little formal education and for high tech jobs requiring advanced degrees or highly technical skills.

The housing market continues to experience decline in fair market rents (though expected to stabilize soon) caused by a surge in new apartment building in 2001 and 2002, and historically low interest rates that allowed many renters to become homeowners. In outlying rural areas along the Interstate 25 and Interstate 70 corridors north and east of Denver, farmland is being converted into housing subdivisions, reducing traditional reliance on agriculture and increasing reliance on the Denver

metropolitan job market. Affordable housing continues to be a development need, particularly in neighborhoods surrounding the downtown area as well as among service sector employees. Community contacts also mentioned finance for education as a development need to enhance employment and income opportunities.

<b>EXHIBIT 4 ASSESSMENT AREA DEMOGRAPHICS</b>									
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
Low-income	21	3.9	19,794	3.6	5,426	27.4	100,761	18.2	
Moderate-income	144	26.5	138,457	25.0	14,436	10.4	104,087	18.8	
Middle-income	214	39.4	224,307	40.5	7,734	3.4	131,882	23.8	
Upper-income	153	28.2	171,616	30.9	2,891	1.7	217,444	39.2	
Unknown-income	11	2.0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>543</b>	<b>100.0</b>	<b>554,174</b>	<b>100.0</b>	<b>30,487</b>	<b>5.5</b>	<b>554,174</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-occupied</b>			<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	
Low-income	38,793	10,760	1.9	27.7	25,943	66.9	2,090	5.4	
Moderate-income	250,569	124,110	21.7	49.5	116,935	46.7	9,524	3.8	
Middle-income	368,461	244,655	42.7	66.4	110,918	30.1	12,888	3.5	
Upper-income	229,706	192,882	33.7	84.0	28,620	12.5	8,204	3.6	
Unknown-income	11	0	0.0	0.0	11	100.0	0	0.0	
<b>Total Assessment Area</b>	<b>887,540</b>	<b>572,407</b>	<b>100.0</b>	<b>64.5</b>	<b>282,427</b>	<b>31.8</b>	<b>32,706</b>	<b>3.7</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>				<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	4,233	4.0	3,624	3.8	440	4.6	169	5.6	
Moderate-income	26,638	24.9	22,799	24.2	3,085	32.5	754	25.2	
Middle-income	39,348	36.8	35,234	37.4	3,025	31.8	1,089	36.3	
Upper-income	35,936	33.6	32,248	34.2	2,738	28.8	950	31.7	
Tract not reported	664	0.6	420	0.4	210	2.2	34	1.1	
<b>Total Assessment Area</b>	<b>106,819</b>	<b>100.0</b>	<b>94,325</b>	<b>100.0</b>	<b>9,498</b>	<b>100.0</b>	<b>2,996</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>88.3</b>		<b>8.9</b>		<b>2.8</b>	

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER/WELD COUNTY ASSESSMENT AREA**

### **LENDING TEST**

The bank demonstrated **High Satisfactory** performance in meeting the credit needs of the Denver/Weld County assessment area. The evaluation of home mortgage and small business loans found a good distribution of loans among low- and moderate-income geographies and individuals, and among small-revenue businesses. The volume of direct and secondary market lending activity indicated reasonable performance in meeting credit demand for mortgage and small business loans. The bank also continued to demonstrate excellent performance in making community development loans to provide affordable housing for low- and moderate-income individuals and to revitalize or stabilize low- and moderate-income census tracts. Refer to Appendix C, CRA Core Tables 1-4 for additional information on the bank's lending activity and CRA Tables 5 and 6 for peer group lending activity.

#### **Lending Activity:**

The bank demonstrated good responsiveness to credit needs in the Denver/Weld County assessment area through small business loans and loans to consumers for home purchase, refinance, and home improvement. In 2004 and the first half of 2005, the bank originated \$300.6 million in small business loans and \$240.6 million in home mortgage loans within the assessment area. Among all peer lenders that extended credit in the assessment area in 2004 (the latest year for which peer data were available), the bank accounted for 6.5 percent of the dollar volume of small business loans and 0.4 percent of home mortgage loans. Besides its direct lending activities, the bank also helped to meet demand for mortgage credit by brokering or selling 3,734 mortgage loans totaling \$725.7 million to the secondary market.

In its direct lending activities, the bank participated in programs specifically targeted to meet the credit needs of small businesses and low- and moderate-income consumers. These included participation in SBA guaranteed loan programs for small businesses, and CHFA lender programs for low- and moderate-income Colorado borrowers whose incomes do not otherwise qualify for residential mortgage loans. Since the prior examination, the bank originated \$18.1 million in SBA loans and \$1.5 million in CHFA loans. The bank plans to initiate other programs including a mortgage lending program targeted to first-time home buyers.

#### **Geographic Distribution:**

##### *HMDA Loans*

The bank demonstrated a good geographic distribution of mortgage loans in the Denver/Weld County assessment area, particularly in low- and moderate-income

census tracts. A majority of this activity occurred in 2004, prior to the bank's reorganizing its direct and secondary-market mortgage functions. In 2004, the bank originated for HMDA reporting purposes 1,149 mortgage loans totaling \$222.9 million. Due to the reorganization of the mortgage function, this volume declined considerably in the first half of 2005 with 111 mortgage loan originations totaling \$17.7 million.

Over the 2004 and 2005 period, the bank originated 21 percent of its mortgage loans (about 14 percent by dollar volume) in low- and moderate-income tracts. This compared favorably with the demographics of the assessment area showing that fewer than 24 percent of all owner-occupied homes were in low- and moderate-income tracts based on 2000 Census data. Furthermore, aggregate statistics of other lenders with mortgage credit in the assessment area showed that 21 percent of their loans (17 percent by dollar volume) originated in low- and moderate-income tracts during 2004.

#### *Small Business Loans*

The bank demonstrated a good geographic distribution of small business loans in the assessment area, particularly in low- and moderate-income tracts. In 2004, the bank originated 877 small business loans totaling \$185.9 million, while through the first half of 2005 it originated 585 loans totaling \$114.7 million. The proportion of loans to small businesses in low- and moderate-income tracts averaged 27 percent over the period, while the proportion based on dollar volume remained constant at about 29 percent. This performance compared reasonably well to assessment area demographics, which showed that 29 percent of assessment area businesses were located in low- and moderate-income tracts in 2000. The performance was also comparable to statistics reported by aggregate peer lenders. In 2004, 28 percent of their small business loans (33 percent based on dollar volume) were made to businesses in low- and moderate-income tracts.

#### **Distribution by Borrower Income and Revenue Size of the Business:**

##### *HMDA Loans*

The bank demonstrated a good distribution of home mortgage loans among borrowers of varying income levels, including low- and moderate-income borrowers, relative to peer statistics and area demographics. Over the evaluation period, 25 to 26 percent of HMDA loans originated by the bank within the assessment area were to low- and moderate-income borrowers. By dollar volume, however, the proportion slipped from 17 percent of total dollars loaned to low- and moderate-income borrowers in 2004 to 11 percent in 2005. This was attributable, in part, to the mortgage function reorganization that resulted in across-the-board declines in mortgage loan activity among all income levels. The effect was somewhat more pronounced on a dollar volume basis among low- and moderate-income borrowers, whose ability to qualify for loans may have been more than proportionally affected by rising interest rates in 2005 relative to other income groups.

Aggregate statistics showed that in 2004 peer lenders originated 27 percent of their HMDA-reported loans to low- and moderate-income borrowers and 20 percent based on dollar volume. In 2000, low- and moderate-income families accounted for 37 percent of assessment area families. Six percent of families lived below the poverty threshold, leaving about 32 percent of families who might potentially own homes or qualify for home financing. Since rates of home ownership tend to be lower among low- and moderate-income families, the performance of the bank in making mortgage loans to low- and moderate-income borrowers appeared reasonable relative to other lenders and the demographics of the assessment area.

### *Small Business Loans*

The bank demonstrated a good distribution of small business loans (defined as loans for \$1 million or less) within the assessment area, particularly among businesses reporting gross annual revenues of \$1 million or less. In 2004, these small-revenue businesses received 29 percent of small business loans originated by the bank and 22 percent based on dollar originations. Performance was even stronger in the first half of 2005 with the bank originating 38 percent of small business loans and 31 percent by dollar volume to small-revenue businesses. Other lenders in the assessment area reported comparable performance, originating 34 percent of small business loans and 37 percent by dollar volume to businesses with \$1 million or less in gross annual revenues.

### **Community Development Lending:**

The bank continued to exhibit an excellent record of granting community development loans in the Denver/Weld County assessment area. In 2004 and 2005, the bank originated or renewed 13 community development loans totaling \$34.7 million to 10 borrowers in the Denver/Weld County assessment area. Eight of the loans totaling \$29.2 million financed construction or renovation projects providing affordable housing to low- and moderate-income individuals in Parker, Strasburg, Commerce City, and Denver. One loan for \$5.0 million helped to revitalize or stabilize a moderate-income tract west of downtown Denver by renovating and converting a closed hotel into college student housing. Four loans totaling \$500,000 financed working capital of organizations providing pro bono legal assistance to abused and neglected children, and tutoring and counseling services to lower dropout rates among youth from disadvantaged families.

### **INVESTMENT TEST**

An investment test rating of **Low Satisfactory** in the Denver/Weld County assessment area reflected an adequate level of qualified investments and responsiveness to community development needs, although rarely in a leadership position. Qualified investments consisted of one Fannie Mae (FNMA) and two Freddie Mac (FHLMC) mortgage loan pools totaling \$4.3 million purchased in 2005. Mortgages to low- and moderate-income borrowers in the Denver/Weld County assessment area accounted for \$2.4 million of the total. Mortgages in the Boulder MSA assessment area accounted for

the remaining \$1.9 million. The bank also donated \$47,652 to community service agencies providing affordable housing and other services primarily to low- and moderate-income individuals in the Denver/Weld County assessment area.

## **SERVICE TEST**

The bank demonstrated **Low Satisfactory** performance in delivering retail banking services and providing community development services within the Denver/Weld County assessment area. Delivery systems were reasonably accessible to geographies and individuals of different income levels. Within the context of the current distribution of branches, the record of opening and closing branches saw slight improvement in access to moderate-income geographies. Services, including hours of operation, did not vary in a way that inconvenienced the assessment area, including low- and moderate-income geographies and individuals. Recent ownership and personnel changes, however, limited the bank's involvement in providing financial, managerial, and fundraising expertise to community service organizations.

### **Retail Services:**

The distribution of branches and automated teller machines (ATMs) provided reasonable access to banking services for all income levels and geographies in the Denver/Weld County assessment area. The bank opened 10 new branches in the assessment area in 2004 and 2005, including one in a moderate-income tract in a suburban area on the west side of the Denver MSA. There have been no branch closings since the previous examination. Of the 17 full-service main and branch offices in the assessment area, 2 are located in moderate-income tracts and 15 are located in middle- and upper-income tracts.

All locations have cash-dispensing ATMs, and all locations except one have teller drive-up facilities. Besides the cash-dispensing ATMs, customers have free access to 18 deposit-taking DASH Network ATM locations operated by Centennial Bank of the West, an affiliate owned by the bank's parent company. These ATMs are located in Weld and Laramie County communities north of the Denver MSA. Six locations that comprised the former First National Bank of Strasburg continue to offer Saturday drive-up teller hours. The other 11 locations offer banking hours only during weekdays. Other alternative delivery systems offered by the bank include 24-hour telephone banking and Internet banking services.

### **Community Development Services:**

The bank demonstrated a limited level of community development services, partly due to turnover in personnel following a change in ownership during 2004. At this examination, six bank officers provided financial, managerial, and fundraising assistance to nine organizations primarily involved in providing financial or other

services to low- and moderate-income individuals and small businesses in the assessment area. At the previous examination, 18 officers volunteered service to 17 organizations with community development as their primary purpose.

**METROPOLITAN AREA  
Limited-Scope Review**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN BOULDER MSA  
ASSESSMENT AREA**

The bank operated two branches in moderate- and middle-income census tracts in the Boulder MSA. The Longmont branch opened in 2001, and the downtown Boulder branch opened in 2003. These branches accounted for 7 percent of the bank's HMDA and CRA-reported mortgage and small business loans in 2004 and 2005. The bank held 0.5 percent of assessment area deposits as of June 30, 2005, and ranked 25<sup>th</sup> in deposit size out of 30 depository institutions reporting Federal Deposit Insurance Corporation (FDIC)-insurable deposits in the assessment area.

The Boulder MSA is comprised of 2 low-income, 15 moderate-income, 26 middle-income, and 20 upper-income census tracts as of the 2000 Census. It had a population of 269,814 and 63,780 family households. Thirty-seven percent of family households were considered low- or moderate-income, with almost 5 percent living below the poverty threshold. The median family income was \$69,675 in 2000 and \$78,600 in 2004. Sixty-two percent of housing was owner-occupied at a median housing value of \$234,955, while 34 percent was rental housing at a median gross rent of \$829 per month. Over two percent of the population lived in college dormitories due to the Boulder location of the University of Colorado's main campus.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOULDER  
MSA**

Information reviewed, including performance information, can be found in the Appendix B to this report. Conclusions for the Boulder MSA assessment area where a limited review was conducted indicate performance under each of the tests was consistent with performance in the Denver/Weld County assessment area. Under the lending test, the bank demonstrated an excellent distribution of small business loans in low- and moderate-income tracts and among businesses with gross annual revenues of \$1 million or less. The bank also originated a good level of community development loans (\$5.9 million) given the size of its operations in the assessment area.

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Boulder MSA	Consistent	Consistent	Consistent

## CRA APPENDIX A

<b>SCOPE OF EXAMINATION</b>			
<b>TIME PERIOD REVIEWED</b>	Community Development Loans, Investments, Services, and Branching: January 1, 2004 to June 30, 2005 HMDA and CRA Loan Data: January 1, 2004 to June 30, 2005		
<b>FINANCIAL INSTITUTION</b>  Guaranty Bank and Trust Company Denver, Colorado			<b>PRODUCTS REVIEWED</b>  <ul style="list-style-type: none"> <li>• Home Purchase Loans</li> <li>• Home Refinance Loans</li> <li>• Home Improvement Loans</li> <li>• Community Development Loans</li> <li>• Business Loans</li> </ul>
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
Centennial Bank Holdings, Inc.	Holding Company	None	
Residential Mortgage Group.	Sub of Guaranty Bank and Trust Company	Secondary Market Loans	
Commercial Lenders Group	Sub of Guaranty Bank and Trust Company	Commercial Loans	
Centennial Bank of the West	Sub of Holding Company	None	
Collegiate Peaks Bank	Sub of Holding Company	None	
First MainStreet Insurance	Sub of Holding Company	None	
Guaranty Cap Trust III	Sub of Holding Company	None	

**LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION**

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED
Denver/Weld County AA	Full Scope	1331 17th Street, Denver, CO (Main Bank) 3301 East 1st Avenue, Denver, CO (Cherry Creek Br) 56540 East Colfax Avenue, Strasburg, CO (Strasburg Br) 2707 East Bromley Lane, Brighton, CO (Brighton Br)
Boulder MSA	Limited Scope	1375 Walnut Street, Boulder, CO (Boulder Bank)

**Note:** Branches visited indicates where technical compliance with the CRA was confirmed. The evaluation of the bank's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Examination.

## CRA APPENDIX B

### GLOSSARY

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

**Census tract:** A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons and average about 4,000 inhabitants.

**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.

**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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into "male householder" (a family with a male householder and no wife present) or "female householder" (a family with a female householder and no husband present).

**Full review:** Performance under the lending, investment and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

**Home Mortgage Disclosure Act (“HMDA”):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include data such as race, gender and income of applications, amount of loan requested, and disposition of the application (for example, approved, denied, and withdrawn).

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

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

**Limited review:** Performance under the lending, investment and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Metropolitan area (“MA”):** Any primary metropolitan statistical area (“PMSA”), metropolitan statistical area (“MSA”), or consolidated metropolitan statistical area (“CMSA”), as defined by the Office of Management and Budget, with a population of 250 thousand or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination.

Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

## APPENDIX C CRA CORE TABLES

**Table 1**  
**HMDA & CRA Loan Distribution Table**  
**Denver/Weld County Assessment Area**  
**For Loan Year 2004**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	34	3.0%	5,312	2.4%	61	5.3%	6,623	3.0%
Moderate	201	17.5%	27,069	12.1%	229	19.9%	30,927	13.9%
<i>Low/Moderate Total</i>	<i>235</i>	<i>20.5%</i>	<i>32,381</i>	<i>14.5%</i>	<i>290</i>	<i>25.2%</i>	<i>37,550</i>	<i>16.8%</i>
Middle	499	43.4%	85,264	38.3%	294	25.6%	46,823	21.0%
Upper	414	36.0%	105,101	47.2%	395	34.4%	105,532	47.3%
Unknown	1	0.1%	150	0.1%	170	14.8%	32,991	14.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1,149</i>	<i>100.0%</i>	<i>222,896</i>	<i>100.0%</i>	<i>1,149</i>	<i>100.0%</i>	<i>222,896</i>	<i>100.0%</i>
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	44	5.0%	7,980	4.3%	0	0.0%	0	0.0%
Moderate	211	24.1%	47,602	25.6%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>255</i>	<i>29.1%</i>	<i>55,582</i>	<i>29.9%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	237	27.0%	49,190	26.5%	0	0.0%	0	0.0%
Upper	365	41.6%	76,490	41.1%	0	0.0%	0	0.0%
Unknown	20	2.3%	4,674	2.5%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>877</i>	<i>100.0%</i>	<i>185,936</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Revenue							
Total \$1 Million or Less	251	28.6%	40,092	21.6%	0	0.0%	0	0.0%
Over \$1 Million	284	32.4%	67,430	36.3%	0	0.0%	0	0.0%
Not Known	342	39.0%	78,414	42.2%	0	0.0%	0	0.0%
<i>Total</i>	<i>877</i>	<i>100.0%</i>	<i>185,936</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Loan Size							
\$100,000 or less	431	49.1%	23,680	12.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	207	23.6%	37,378	20.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	239	27.3%	124,878	67.2%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>877</i>	<i>100.0%</i>	<i>185,936</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	142	56.6%	6,778	16.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	63	25.1%	10,827	27.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	46	18.3%	22,487	56.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>251</i>	<i>100.0%</i>	<i>40,092</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

**Table 2**  
**HMDA & CRA Loan Distribution Table**  
**Denver/Weld County Assessment Area**  
**For Loan Year 2005**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	1	0.9%	4	0.0%	8	7.2%	709	4.0%
Moderate	23	20.7%	2,370	13.4%	21	18.9%	1,217	6.9%
<i>Low/Moderate Total</i>	<i>24</i>	<i>21.6%</i>	<i>2,374</i>	<i>13.4%</i>	<i>29</i>	<i>26.1%</i>	<i>1,926</i>	<i>10.9%</i>
Middle	53	47.7%	5,117	28.9%	27	24.3%	3,042	17.2%
Upper	34	30.6%	10,225	57.7%	43	38.7%	9,310	52.6%
Unknown	0	0.0%	0	0.0%	12	10.8%	3,438	19.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>111</i>	<i>100.0%</i>	<i>17,716</i>	<i>100.0%</i>	<i>111</i>	<i>100.0%</i>	<i>17,716</i>	<i>100.0%</i>
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	27	4.6%	6,015	5.2%	0	0.0%	0	0.0%
Moderate	114	19.5%	26,536	23.1%	6	11.1%	612	10.6%
<i>Low/Moderate Total</i>	<i>141</i>	<i>24.1%</i>	<i>32,551</i>	<i>28.4%</i>	<i>6</i>	<i>11.1%</i>	<i>612</i>	<i>10.6%</i>
Middle	217	37.1%	35,021	30.5%	44	81.5%	4,849	83.9%
Upper	221	37.8%	46,006	40.1%	4	7.4%	319	5.5%
Unknown	6	1.0%	1,155	1.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>585</i>	<i>100.0%</i>	<i>114,733</i>	<i>100.0%</i>	<i>54</i>	<i>100.0%</i>	<i>5,780</i>	<i>100.0%</i>
	By Revenue							
Total \$1 Million or Less	220	37.6%	35,322	30.8%	33	61.1%	3,494	60.4%
Over \$1 Million	167	28.5%	37,444	32.6%	1	1.9%	25	0.4%
Not Known	198	33.8%	41,967	36.6%	20	37.0%	2,261	39.1%
<i>Total</i>	<i>585</i>	<i>100.0%</i>	<i>114,733</i>	<i>100.0%</i>	<i>54</i>	<i>100.0%</i>	<i>5,780</i>	<i>100.0%</i>
	By Loan Size							
\$100,000 or less	288	49.2%	13,801	12.0%	39	72.2%	1,329	23.0%
\$100,001 - \$250,000	144	24.6%	26,286	22.9%	9	16.7%	1,927	33.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	153	26.2%	74,646	65.1%	6	11.1%	2,524	43.7%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>585</i>	<i>100.0%</i>	<i>114,733</i>	<i>100.0%</i>	<i>54</i>	<i>100.0%</i>	<i>5,780</i>	<i>100.0%</i>
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	125	56.8%	5,567	15.8%	24	72.7%	763	21.8%
\$100,001 - \$250,000	50	22.7%	8,562	24.2%	5	15.2%	1,091	31.2%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	45	20.5%	21,193	60.0%	4	12.1%	1,640	46.9%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>220</i>	<i>100.0%</i>	<i>35,322</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>3,494</i>	<i>100.0%</i>

**Table 3**  
**HMDA & CRA Loan Distribution Table**  
**Boulder MSA Assessment Area**  
**For Loan Year 2004**

Income Categories	HMDA								
	By Tract Income				By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	9	27.3%	1,836	20.8%	6	18.2%	791	9.0%	
<i>Low/Moderate Total</i>	9	27.3%	1,836	20.8%	6	18.2%	791	9.0%	
Middle	17	51.5%	4,003	45.3%	11	33.3%	2,107	23.9%	
Upper	7	21.2%	2,992	33.9%	9	27.3%	4,191	47.5%	
Unknown	0	0.0%	0	0.0%	7	21.2%	1,742	19.7%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	33	100.0%	8,831	100.0%	33	100.0%	8,831	100.0%	
	SMALL BUSINESS				SMALL FARM				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	<b>By Tract Income</b>								
	Low	4	3.7%	283	1.6%	0	0.0%	0	0.0%
	Moderate	40	36.7%	6,783	37.9%	0	0.0%	0	0.0%
	<i>Low/Moderate Total</i>	44	40.4%	7,066	39.5%	0	0.0%	0	0.0%
	Middle	36	33.0%	5,975	33.4%	0	0.0%	0	0.0%
	Upper	29	26.6%	4,845	27.1%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	109	100.0%	17,886	100.0%	0	0.0%	0	0.0%
	<b>By Revenue</b>								
	Total \$1 Million or Less	54	49.5%	6,904	38.6%	0	0.0%	0	0.0%
	Over \$1 Million	23	21.1%	3,900	21.8%	0	0.0%	0	0.0%
	Not Known	32	29.4%	7,082	39.6%	0	0.0%	0	0.0%
	<i>Total</i>	109	100.0%	17,886	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size</b>								
	\$100,000 or less	67	61.5%	2,910	16.3%	0	0.0%	0	0.0%
	\$100,001 - \$250,000	26	23.9%	4,642	26.0%	0	0.0%	0	0.0%
	\$250,001 - \$1 Million (Bus)-\$500k (Farm)	16	14.7%	10,334	57.8%	0	0.0%	0	0.0%
	Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	109	100.0%	17,886	100.0%	0	0.0%	0	0.0%
	<b>By Loan Size and Revenue \$1 Million or Less</b>								
	\$100,000 or less	36	66.7%	1,578	22.9%	0	0.0%	0	0.0%
	\$100,001 - \$250,000	13	24.1%	2,445	35.4%	0	0.0%	0	0.0%
	\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	9.3%	2,881	41.7%	0	0.0%	0	0.0%
	Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	54	100.0%	6,904	100.0%	0	0.0%	0	0.0%	

**Table 4**  
**HMDA & CRA Loan Distribution Table**  
**Boulder MSA Assessment Area**  
**For Loan Year 2005**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	50.0%	100	34.4%	0	0.0%	0	0.0%
Upper	1	50.0%	191	65.6%	2	100.0%	291	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>291</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>291</i>	<i>100.0%</i>
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	2	2.3%	225	1.6%	0	0.0%	0	0.0%
Moderate	39	45.3%	6,160	42.6%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>41</i>	<i>47.7%</i>	<i>6,385</i>	<i>44.2%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	27	31.4%	5,903	40.8%	0	0.0%	0	0.0%
Upper	18	20.9%	2,174	15.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>86</i>	<i>100.0%</i>	<i>14,462</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Revenue							
Total \$1 Million or Less	47	54.7%	6,639	45.9%	0	0.0%	0	0.0%
Over \$1 Million	17	19.8%	2,370	16.4%	0	0.0%	0	0.0%
Not Known	22	25.6%	5,453	37.7%	0	0.0%	0	0.0%
<i>Total</i>	<i>86</i>	<i>100.0%</i>	<i>14,462</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Loan Size							
\$100,000 or less	49	57.0%	2,362	16.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	24	27.9%	4,041	27.9%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	13	15.1%	8,059	55.7%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>86</i>	<i>100.0%</i>	<i>14,462</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	28	59.6%	1,162	17.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	13	27.7%	2,218	33.4%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	6	12.8%	3,259	49.1%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>47</i>	<i>100.0%</i>	<i>6,639</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

**Table 5**  
**Peer Group HMDA & CRA Loan Distribution Table**  
**Denver/Weld County Assessment Area**  
**Selected Year: 2004**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Low	6,941	2.5%	1,054,044	2.0%	16,632	5.9%	1,863,402	3.6%
Moderate	53,047	18.9%	7,555,210	14.5%	59,470	21.2%	8,383,418	16.1%
<i>Low/Moderate Total</i>	<i>59,988</i>	<i>21.4%</i>	<i>8,609,254</i>	<i>16.6%</i>	<i>76,102</i>	<i>27.1%</i>	<i>10,246,820</i>	<i>19.7%</i>
Middle	116,478	41.5%	19,429,341	37.4%	67,338	24.0%	11,270,322	21.7%
Upper	102,438	36.5%	23,589,285	45.4%	83,931	29.9%	20,196,119	38.9%
Unknown	1,473	0.5%	333,137	0.6%	53,006	18.9%	10,247,756	19.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>280,377</i>	<i>100.0%</i>	<i>51,961,017</i>	<i>100.0%</i>	<i>280,377</i>	<i>100.0%</i>	<i>51,961,017</i>	<i>100.0%</i>
	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	2,898	3.4%	118,576	4.2%	6	0.9%	42	0.1%
Moderate	19,606	22.8%	834,414	29.4%	52	8.2%	971	3.0%
<i>Low/Moderate Total</i>	<i>22,504</i>	<i>26.2%</i>	<i>952,990</i>	<i>33.5%</i>	<i>58</i>	<i>9.1%</i>	<i>1,013</i>	<i>3.1%</i>
Middle	29,652	34.5%	858,984	30.2%	352	55.4%	18,130	55.9%
Upper	30,665	35.6%	939,829	33.1%	212	33.4%	13,108	40.4%
Unknown	1,335	1.6%	67,678	2.4%	4	0.6%	80	0.2%
Tract Unknown	1,885	2.2%	21,957	0.8%	9	1.4%	89	0.3%
<i>Total</i>	<i>86,041</i>	<i>100.0%</i>	<i>2,841,438</i>	<i>100.0%</i>	<i>635</i>	<i>100.0%</i>	<i>32,420</i>	<i>100.0%</i>
	By Revenue							
Total \$1 Million or Less	29,376	34.1%	1,053,530	37.1%	533	83.9%	26,759	82.5%
	By Loan Size							
\$100,000 or Less	80,889	94.0%	940,089	33.1%	551	86.8%	13,382	41.3%
\$100,001 - \$250,000	2,402	2.8%	434,769	15.3%	63	9.9%	10,966	33.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2,750	3.2%	1,466,580	51.6%	21	3.3%	8,072	24.9%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>86,041</i>	<i>100.0%</i>	<i>2,841,438</i>	<i>100.0%</i>	<i>635</i>	<i>100.0%</i>	<i>32,420</i>	<i>100.0%</i>

**Table 6**  
**Peer Group HMDA & CRA Loan Distribution Table**  
**Boulder MSA Assessment Area**  
Selected Year: 2004

Income Categories	HMDA								
	By Tract Income				By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Low	106	0.4%	20,555	0.3%	1,848	6.7%	238,468	3.7%	
Moderate	5,080	18.5%	921,922	14.2%	5,053	18.4%	837,721	12.9%	
<i>Low/Moderate Total</i>	<i>5,186</i>	<i>18.9%</i>	<i>942,477</i>	<i>14.5%</i>	<i>6,901</i>	<i>25.2%</i>	<i>1,076,189</i>	<i>16.6%</i>	
Middle	13,015	47.4%	2,810,599	43.3%	5,960	21.7%	1,204,846	18.6%	
Upper	9,096	33.2%	2,703,064	41.7%	9,367	34.1%	2,883,813	44.4%	
Unknown	135	0.5%	32,309	0.5%	5,204	19.0%	1,323,601	20.4%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	<i>27,432</i>	<i>100.0%</i>	<i>6,488,449</i>	<i>100.0%</i>	<i>27,432</i>	<i>100.0%</i>	<i>6,488,449</i>	<i>100.0%</i>	
	SMALL BUSINESS				SMALL FARM				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	By Tract Income								
	Low	99	0.8%	3,873	0.9%	0	0.0%	0	0.0%
	Moderate	3,535	28.5%	137,244	32.8%	8	10.1%	227	5.0%
	<i>Low/Moderate Total</i>	<i>3,634</i>	<i>29.3%</i>	<i>141,117</i>	<i>33.8%</i>	<i>8</i>	<i>10.1%</i>	<i>227</i>	<i>5.0%</i>
	Middle	4,610	37.2%	144,510	34.6%	42	53.2%	2,882	63.1%
	Upper	3,598	29.0%	125,499	30.0%	29	36.7%	1,458	31.9%
	Unknown	30	0.2%	397	0.1%	0	0.0%	0	0.0%
	Tract Unknown	518	4.2%	6,305	1.5%	0	0.0%	0	0.0%
	<i>Total</i>	<i>12,390</i>	<i>100.0%</i>	<i>417,828</i>	<i>100.0%</i>	<i>79</i>	<i>100.0%</i>	<i>4,567</i>	<i>100.0%</i>
	By Revenue								
	Total \$1 Million or Less	4,466	36.0%	174,294	41.7%	63	79.7%	3,973	87.0%
	By Loan Size								
	\$100,000 or Less	11,631	93.9%	139,272	33.3%	65	82.3%	1,552	34.0%
\$100,001 - \$250,000	361	2.9%	65,240	15.6%	11	13.9%	2,071	45.3%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	398	3.2%	213,316	51.1%	3	3.8%	944	20.7%	
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	<i>12,390</i>	<i>100.0%</i>	<i>417,828</i>	<i>100.0%</i>	<i>79</i>	<i>100.0%</i>	<i>4,567</i>	<i>100.0%</i>	