



PUBLIC DISCLOSURE

FEBRUARY 03, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**JONAH BANK OF WYOMING
RSSD# 3412417**

**777 WEST FIRST STREET
CASPER, WYOMING 82601**

**Federal Reserve Bank of Kansas City
1 Memorial Drive
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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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**
The Lending Test is rated: **Satisfactory**
The Community Development Test is rated: **Satisfactory**

Jonah Bank of Wyoming (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development (CD) Tests.

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated in the AAs.
- A reasonable dispersion of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- The bank's record of responding to Community Reinvestment Act (CRA)-related complaints was not evaluated, since neither the bank nor the Federal Reserve Bank of Kansas City received any CRA-related complaints since the previous evaluation.
- CD activity reflects adequate responsiveness to CD needs of its AAs.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed using the full-scope review procedures for the Casper Metropolitan Statistical Area (MSA) AA and the Cheyenne MSA AA. The following data was reviewed:

- The bank's 17-quarter average NLTD ratio;
- The entire universe of 1,725 loan originations reported on the bank's 2016 and 2017 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers, as well as a statistical sample of 70 small business loans from a universe of 106 loans originated between January 1, 2018 and December 31, 2018; and,
- CD loans, qualified investments, and CD services from November 16, 2015 to January 30, 2020.

More weight was placed on the bank's mortgage loans, specifically home purchase loans for the analysis. While conclusions with respect to home mortgage lending performance were evaluated for multiple years, only 2017 lending tables are reflected in the body of the report, with

comparisons made to 2016 performance. The bank's 2016 lending data is located in the tables in Appendix C of this report.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Casper, Wyoming. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Jonah Bankshares, a one-bank holding company.
- The bank has total assets of \$334.5 million as of September 30, 2019.
- In addition to its main office in Casper, Wyoming, the bank has one additional office located in Casper, and two located in Cheyenne, Wyoming.
- The bank operates three cash-dispensing automated teller machines (ATMs); one at each branch location except the bank's main office in Casper.
- The bank's primary business focus is commercial and residential real estate lending. Commercial loans comprise the largest portion of the loan portfolio by dollar volume; however, the bank originates a substantial number of secondary market residential real estate loans that are not reflected in its loan portfolio totals.
- The bank has a significant mortgage brokering relationship with a third-party originator (TPO) located in Laramie, Wyoming. The bank provides the credit decision on applications received from the TPO and table-funds TPO-originated conventional and Federal Housing Administration mortgage loans until they are sold through the secondary mortgage market.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF SEPTEMBER 30, 2019		
Loan Type	\$(000)	%
Commercial	199,870	78.4
Residential Real Estate	39,158	15.4
Agricultural	13,293	5.2
Other	1,711	0.7
Consumer	1,635	0.6
Gross Loans	255,667	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its November 16, 2015 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The evaluation first discusses the bank's overall performance based on the NLTD ratio and level of lending within its delineated AAs, followed by a more in-depth discussion of the bank's record of lending in each full-scope AA.

LENDING TEST

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to several similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on their asset size, product offering, and location. The bank's NLTD ratio is reasonable as it is within the range of NLTD ratios of three other similarly situated institutions, excluding the highest and lowest outliers.

TABLE 2 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			17 Quarter Average
Jonah Bank of Wyoming	Casper, Wyoming	334,536	74.5
First Federal Bank and Trust Company	Sheridan, Wyoming	326,948	71.6
RSNB Bank	Rock Springs, Wyoming	361,183	31.8
Platte Valley Bank	Torrington, Wyoming	452,083	97.5
First Northern Bank of Wyoming	Buffalo, Wyoming	370,865	78.5
Western States Bank	Laramie, Wyoming	473,121	82.3

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. A majority of the bank's loans, by number and dollar, are originated inside the AAs.

As mentioned earlier, the bank renders the credit decision and table-funds a significant number of mortgage loans originated by the TPO. As such, these loans are reported as HMDA loans by the bank rather than the TPO. The majority of TPO loans are originated within Albany County, a nonmetropolitan area which is adjacent to the bank's Cheyenne MSA AA. Due to regulatory requirements, the bank is unable to include any of the Albany County tracts in its Cheyenne MSA AA delineation. If included, the bank's total HMDA loans inside the bank's two AAs would be 94.5 percent by number and 93.9 percent by number, respectively.

**TABLE 3
LENDING INSIDE AND OUTSIDE THE AA(S)**

Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	868	178,792	62.5	66.7	520	89,214	37.5	33.3
Home Refinance	181	36,130	61.6	63.0	113	21,213	38.4	37.0
Home Improvement	27	4,414	65.9	57.0	14	3,325	34.1	43.0
Multifamily	2	1,318	100.0	100.0	0	0	0.0	0.0
Total HMDA Loans	1,078	220,654	62.5	66.0	647	113,752	37.5	34.0
Small Business Loans	57	7,482	81.4	70.9	13	3,078	18.6	29.1
Total Loans	1,135	228,136	63.2	66.1	660	116,830	36.8	33.9

Note: Percentages may not add to 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts. The bank’s overall geographic distribution of loans reflects reasonable dispersion throughout the AAs. The distribution by income level of census tracts is reasonable for both home mortgage loans and small business loans in the Casper and Cheyenne MSA AAs.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall reasonable penetration among individuals of different income levels (including LMI) and businesses of different sizes. Lending to borrowers of different income levels and to businesses of different revenue sizes is reasonable for home mortgage loans and small business loans in both full-scope AAs.

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank’s responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AAs. The bank’s overall CD performance demonstrates adequate responsiveness in both of the full-scope AAs. Table 4 shows the number and dollar amount of the bank’s CD activities that benefit the bank’s AAs since the previous CRA evaluation conducted on November 16, 2015.

Since the bank’s CD activities were responsive to AA credit needs, consideration was also given to CD activities that took place outside of the bank’s delineated AAs, but within the greater statewide/regional area that met the requirements for qualified CD credit. This included one loan for \$803,000 for revitalization and stabilization of a moderate-income tract in Laramie, Wyoming.

TABLE 4 COMMUNITY DEVELOPMENT ACTIVITIES									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	2	947	1	475	4	12	5	487	3
Community Services	0	0	0	0	26	60	26	60	5
Economic Development	3	590	0	0	0	0	0	0	0
Revitalization and Stabilization	6	2,677	0	0	4	14	4	14	0
Neighborhood Stabilization Plan	0	0	0	0	0	0	0	0	0
Totals	11	4,214	1	475	34	86	35	561	8

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank’s fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**CASPER METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE CASPER MSA AA

The bank's AA is comprised of Natrona County, which is identical to the Casper MSA, in its entirety (see Appendix A for an AA map).

- The AA is comprised of 18 census tracts, including 1 low-, 3 moderate-, 11 middle-, and 3 upper-income census tracts as of the 2017 FFIEC census data. This represents a change from the 2016 FFIEC data when the AA contained four moderate-, nine middle-, and five upper-income census tracts.
- The bank's presence in the AA includes two full-service offices, its headquarters in a low-income census tract and another branch location in a middle-income census tract. Both offices provide drive-through services while the branch location offers a cash-dispensing ATM.
- According to the June 30, 2019 FDIC Market Share Report, the bank ranks fifth of eight FDIC-insured depository institutions operating in the AA accounting for a 7.7 percent of market share.
- Two community contacts were conducted to augment the CRA performance evaluation and to ascertain the credit and CD needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The representatives interviewed were from a local housing organization and from a local business development organization.

TABLE 5 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Casper MSA	75,450	80,011	6.0
State of Wyoming	563,626	579,679	2.8

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- Natrona County is the second largest county in Wyoming with a population that reflects 13.8 percent of the total population in the state.
- Most of the AA population (73.5 percent) is concentrated in the city of Casper.
- Casper is also the second most populated city in the state and is the county seat of Natrona County.
- According to Moody's Analytics, Omaha, Nebraska, net migration in the AA has been declining from 2016 to 2018.

TABLE 6 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Casper MSA	62,859	71,406	13.6
State of Wyoming	65,964	73,194	11.0

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

- According to the 2015 ACS, the AA concentrations of LMI households, families, and poverty levels are comparable to the statewide levels.
- The affordability ratio, reflecting the ratio of MFI to the median housing value, was 30.6 percent, reflecting lower affordability. The AA ratio was similar to the statewide affordability ratio of 30.2 percent.

TABLE 7 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Casper MSA	173,329	185,646	7.1	647	826	27.5
State of Wyoming	174,000	194,800	12.0	666	789	18.5

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

- The AA had a slightly higher percentage of owner-occupied units at 60.2 percent compared to the state at 58.8 percent while the percentage of rental units at 30.4 percent was higher than the state at 26.3 percent.
- Mobile homes represent a significantly higher percentage of total housing units in the AA's low-income census tract (16.8 percent) and in the AA's moderate-income census tracts (24.9 percent) than in the middle-income census tracts (8.5 percent) and upper-income census tracts (8.2 percent)
- The median age of housing stock in the AA was 47 years, but was 61 years in the sole low-income census tract and the three moderate-income census tracts.
- According to Moody's Analytics, the volume of residential construction of single-family loans was limited with 140 permits issued in 2018. This number has declined annually by 11.5 percent over the previous five years.
- A community contact noted that the housing market in the area appears tight, benefitting sellers. There is little new development occurring in the Casper area, and low inventory is one of the biggest obstacles to home ownership in the AA.

TABLE 8 UNEMPLOYMENT RATES					
Region	2014	2015	2016	2017	2018
Casper MSA	4.0	4.9	7.1	5.2	4.6
State of Wyoming	4.1	4.3	5.3	4.2	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Located in the Powder River Basin, the AA is a hub for coal, oil, and natural gas producers, making energy the primary economic driver followed by health care and retail services.
- Energy production in the AA is weak, with oil prices slightly above the breakeven point for profits while coal and natural gas producers are suffering with prices at or near multiyear lows.
- According to Moody’s Analytics, job growth in the AA lags the rest of the Wyoming and the United States because of weaknesses in mining, manufacturing, and logistics.
- The area's largest employers besides government and school districts include Wal-Mart, Rocky Mountain Power, Wyoming Medical Center, Halliburton, Home Depot, Anadarko Petroleum Corp, Wyoming Machinery Company, and Timberline Hospitalities LLC.
- Community contacts noted that while there is some ambiguity about the future of the oil and gas industry in the Casper area, the economy at present is stable and beneficial to small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CASPER MSA AA

LENDING TEST

Geographic Distribution of Loans

The bank’s geographic distribution of loans reflects reasonable dispersion among the different census tracts within the AA. The bank’s home improvement and multifamily loans were not evaluated in the bank's performance because of the limited volume of loan activity.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank’s distribution of total home mortgage lending in 2017 was comparable to the distribution of lending originated in 2016.

As noted in Table 9, the bank’s lending in the low-income census tract, by both number and dollar was comparable to aggregate lending data and the percentage of owner-occupied housing units (demographic figure). The bank’s lending in moderate-income census tracts, however, was below aggregate lending data and the demographic figure. As mentioned above, demographic

data implies a higher percentage of rentals, older housing, and mobile homes in the LMI census tracts, making it difficult to originate home purchase and refinancing loans. Additionally, two lenders dominated home mortgage lending in the LMI tracts, according to aggregate lending data. Moreover, a community contact noted a tight housing market with low inventory levels in a very competitive market. Conversely, the distribution of lending in middle-income census tracts was comparable to aggregate lending data while also comparable to the demographic figure by dollar, but was above the demographic by number. The bank's lending in upper-income census tracts was comparable to aggregate lending data and the demographic figure by number, but by dollar, the lending was above the demographic figure.

The evaluation of the dispersion of home mortgage lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The bank's distribution of home purchase lending in 2017 was comparable to the distribution of lending originated in 2016.

The bank's lending in the low-income census tract was comparable to both aggregate lending data and the demographic figure, by both number and dollar, whereas, the lending in moderate-income census tracts was below aggregate lending data and the demographic figure. Similar to the demographic constraints and the competitive market conditions, the home purchase lending in the moderate-income census tracts was considered reasonable. The distribution of home purchase lending in middle-income census tracts was comparable to aggregate lending data and the demographic figure by dollar volume while, by number, the bank's lending was comparable to aggregate lending data, but above the demographic figure. The bank's lending by both number and dollar in upper-income census tracts was above aggregate lending data. By dollar, the bank's lending was above the demographic figure, but comparable by number.

The evaluation of the dispersion of home purchase lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

Home Refinance Lending

The geographic distribution of home refinance lending is poor. The distribution of home refinance lending in 2017 was better than the bank's 2016 performance.

The bank's lending in the low-income census tract was comparable to aggregate lending data and the demographic figure by both number and dollar. In 2017, the bank did not have any loans and, in 2016 had only one loan in moderate-income census tracts. As such, the bank's lending performance was below aggregate lending data and the demographic figure. Despite the lending barriers noted above, the bank's lack of any significant refinance lending in LMI census tracts was less than reasonable. The bank's lending in the middle-income census tracts was above aggregate lending data and the demographic figure by both number and dollar, while the lending

in the upper-income census tracts was comparable to aggregate lending data and the demographic data, except when compared to aggregate lending data by dollar percent.

Considering the lower volume of home refinance lending, the evaluation of the dispersion of home mortgage lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

**TABLE 9
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans			Aggregate HMDA Data		% of Owner- Occupied Units	
		\$(000)	#%	\$%	#%		\$%
Total Home Mortgage Loans							
Low	3	195	2.8	0.9	2.6	1.4	4.0
Moderate	4	626	3.7	3.0	11.3	8.6	10.2
Middle	81	14,972	75.0	71.6	71.1	69.2	68.1
Upper	20	5,127	18.5	24.5	15.0	20.8	17.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	2	100	2.2	0.6	2.3	1.2	4.0
Moderate	4	626	4.3	3.5	12.0	9.7	10.2
Middle	69	12,717	74.2	70.2	72.4	70.7	68.1
Upper	18	4,672	19.4	25.8	13.3	18.4	17.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	1	95	7.1	3.6	2.7	1.5	4.0
Moderate	0	0	0.0	0.0	9.7	6.9	10.2
Middle	11	2,115	78.6	79.4	69.6	65.9	68.1
Upper	2	455	14.3	17.1	18.0	25.7	17.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.3	3.5	4.0
Moderate	0	0	0.0	0.0	8.0	2.8	10.2
Middle	1	140	100.0	100.0	61.1	46.6	68.1
Upper	0	0	0.0	0.0	25.7	47.2	17.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	66.7	6.9	15.7
Moderate	0	0	0.0	0.0	0.0	0.0	6.4
Middle	0	0	0.0	0.0	33.3	93.1	68.8
Upper	0	0	0.0	0.0	0.0	0.0	9.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2017 FFIEC Census Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. As illustrated in Table 10, the bank’s small business lending in the low-income census tract was well below the percent of businesses operating in this census tract (demographic figure), by both number and dollar volume. The AA’s only low-income census tract encompasses the downtown neighborhood along with adjacent residential neighborhoods. Most of the businesses are small retail locations or stores of national chains. The bank’s small business lending focus is targeted to light industrial and energy ancillary businesses rather than on retail lending. Conversely, the bank’s small business lending in the moderate-income census tracts was well above the demographic figure by number and comparable by dollar volume. In the middle-income census tracts, the bank’s lending by number was comparable to the demographic figure, while by dollar, the lending was well above. The small business lending in upper-income census tracts was comparable to the demographic figure by both number and dollar.

The evaluation of the dispersion of small business lending in 2018 did identify some gaps in lending among different census tracts, but these gaps were not considered significant. Most gaps were noted in census tracts that were predominantly residential or were not densely populated.

TABLE 10 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY					
Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	2	273	5.7	8.6	18.7
Moderate	8	376	22.9	11.9	10.0
Middle	18	2,080	51.4	65.7	54.7
Upper	7	435	20.0	13.7	16.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

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

The bank’s lending has a reasonable penetration among individuals of different income levels and businesses of different sizes. The bank’s home improvement loans were not evaluated in the bank’s performance because of the limited volume of loan activity.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank’s 2017 home mortgage lending performance was better than the bank’s 2016 lending.

As shown in Table 11, the bank's home mortgage lending to low-income borrowers was comparable to aggregate lending data both by number and by dollar, while both aggregate lending data and the bank's lending were below the percent of low-income families (demographic figure) in the AA. As noted earlier, the AA has low housing affordability, permit activity, and inventory levels that may prevent low-income borrowers from being able to obtain home ownership. This context affected both home purchase and refinance lending. The bank's lending to both moderate- and middle-income borrowers was comparable by both number and dollar to aggregate lending data and the demographic figure. The bank's lending to upper-income borrowers by both number and dollar was well above aggregate lending data, while the lending was comparable to the demographic figure by number and was well-above by dollar. The lending analysis is skewed as aggregate lenders had a higher percentage of mortgage loans in which the borrower income was not reported and, therefore, unknown. The analysis is also skewed for the products noted below.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The bank's 2017 lending performance was consistent with its performance in 2016.

The bank's lending to low-income borrowers was comparable to aggregate lending data by both number and dollar, but both the bank's lending and aggregate lending data was below the demographic figure by number and well below by dollar. The bank's lending to both moderate and middle-income borrowers was comparable to aggregate lending data and to the demographic figure by both number and dollar. The lending to upper-income borrowers was well above aggregate lending data by number and dollar while the lending by number was comparable to the demographic figure, but by dollar was well-above.

Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The bank's 2017 lending performance was consistent with its performance in 2016.

The bank's home refinance lending to low-income borrowers was comparable to aggregate lending data by both number and dollar, but below the demographic figure by number and well below by dollar. The bank's lending to moderate-income borrowers was comparable to aggregate lending data and the demographic figure by number; however, the bank's lending was below the demographic figure by dollar. The lending to middle-income borrowers was comparable to aggregate lending data and the demographic by number, but was above each by dollar. The bank's lending to upper-income borrowers was well-above aggregate lending data by both number and dollar, while the bank's lending compared to the demographic figure was comparable by number and above by dollar.

**TABLE 11
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	%	#%	%	
Total Home Mortgage Loans							
Low	15	1,512	13.9	7.2	11.0	5.7	21.1
Moderate	21	2,935	19.4	14.0	21.8	16.0	16.4
Middle	25	4,417	23.1	21.1	22.8	22.3	21.7
Upper	46	11,976	42.6	57.2	23.4	31.4	40.7
Unknown	1	80	0.9	0.4	21.1	24.6	0.0
Home Purchase Loans							
Low	13	1,287	14.0	7.1	10.8	5.7	21.1
Moderate	18	2,700	19.4	14.9	23.8	17.6	16.4
Middle	21	3,521	22.6	19.4	22.8	23.3	21.7
Upper	40	10,527	43.0	58.1	22.6	30.6	40.7
Unknown	1	80	1.1	0.4	20.0	22.8	0.0
Home Refinance Loans							
Low	2	225	14.3	8.4	11.2	6.2	21.1
Moderate	3	235	21.4	8.8	16.9	12.8	16.4
Middle	3	756	21.4	28.4	23.1	21.1	21.7
Upper	6	1,449	42.9	54.4	23.4	33.3	40.7
Unknown	0	0	0.0	0.0	25.4	26.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	12.4	6.7	21.1
Moderate	0	0	0.0	0.0	17.7	13.7	16.4
Middle	1	140	100.0	100.0	22.1	18.2	21.7
Upper	0	0	0.0	0.0	38.9	53.8	40.7
Unknown	0	0	0.0	0.0	8.8	7.7	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	21.1
Moderate	0	0	0.0	0.0	0.0	0.0	16.4
Middle	0	0	0.0	0.0	0.0	0.0	21.7
Upper	0	0	0.0	0.0	0.0	0.0	40.7
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

Source: 2017 FFIEC Census Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenues of \$1MM or less was below the percentage of small businesses in the AA by number, but was comparable by dollar. However, information for aggregate lenders who report data under the CRA showed lending to small businesses at 49.7 percent by number and 42.7 percent by dollar. While institutions included in the aggregate lending data are not a direct comparison as the bank is not a CRA reporter, these aggregate lending levels are reflective of the overall demand for credit from small businesses in the AA.

The bank’s lending to businesses with gross annual revenues over \$1MM was above the demographic figure.

In addition, based on loan size, 91.4 percent of the bank’s small business loans were in the amount of \$250,000 or less. Typically, smaller businesses do not have the need or capacity to borrow large amounts.

TABLE 12 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	28	2,724	80.0	86.1	89.0
Over \$1 Million	7	440	20.0	13.9	10.2
Not Known	0	0	0.0	0.0	0.8
Total	35	3,164	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	28	1,245	80.0	39.3	
\$100,001 – \$250,000	4	793	11.4	25.1	
\$250,001 – \$1 Million	3	1,126	8.6	35.6	
Total	35	3,164	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	21	805	75.0	29.6	
\$100,001 – \$250,000	4	793	14.3	29.1	
\$250,001 – \$1 Million	3	1,126	10.7	41.3	
Total	28	2,724	100.0	100.0	
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2015 U.S. Census Bureau: American Community Survey</i>					
<i>NOTE: Percentages may not add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The bank’s CD performance demonstrates adequate responsiveness in the Casper MSA AA.

Through the evaluation period, the bank originated six CD loans for \$3.4MM including five loans for 2.5MM for revitalization and stabilization and one loan for multifamily affordable housing. Although the bank did not have any equity or bond investments in the AA, the bank did contribute 16 donations totaling \$36,000. Ten of the donations were for community services, four were for revitalization and stabilization, and two were for affordable housing. Regarding CD services, the bank had three services for affordable housing and one service benefitting a community service organization. The following are specific examples of CD activities that were responsive to the Casper MSA AA needs:

- The bank financed an \$850,000 mortgage loan to a private investor to purchase a recently remodeled, 20-unit apartment building in a low-income census tract. The rents charged were considered affordable and were below the average median rents in the AA.
- The bank contributed \$10,000 to support a new civic space in downtown Casper that provides revitalization and stabilization of a low-income census tract. The project was funded and developed by the Casper Downtown Development Authority, as chartered by the Casper City government.
- For three of the four services in the AA, the bank was the sponsoring member for the Federal Home Loan Bank of Des Moines, Des Moines, Iowa, Competitive Affordable Housing Program grants. The bank worked with a local organization on two projects that provided transitional housing to homeless and financially disadvantaged men and women. The other project was to another organization that builds single-family affordable homes for low-income borrowers. The grant process required high involvement from the bank and was responsive to affordable housing needs in the community.

**CHEYENNE METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN CHEYENNE MSA AA

The bank’s AA is comprised of Laramie County, which is identical to the Cheyenne MSA in its entirety (see Appendix A for an AA map).

- As of the 2017 FFIEC census data, the AA is comprised of 21 census tracts, including 6 moderate-, 10 middle-, 4 upper-, and 1 unknown-income census tract. This AA composition differs from the 2016 FFIEC data when the AA contained six moderate-, nine middle-, five upper-, and one unknown-income census tract. The unknown-income census tract consists of the Cheyenne Regional Airport.
- According to the 2019 FDIC Deposit Market Share Report, the bank has a 6.7 percent market share in the AA, ranking 7th out of 18 other FDIC-insured depository institutions.
- The bank’s presence in the AA includes two full-service offices, one in a middle-income census tract and one in an upper-income census tract. Both offices provide drive-thru services and offer a cash-dispensing ATM.
- Two community contacts recently conducted as part of the public evaluations of other financial institutions were reviewed to ascertain the credit and CD needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The representatives interviewed were from a local affordable housing organization and from an economic development organization.

TABLE 13 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Cheyenne MSA	91,738	95,431	4.0
State of Wyoming	563,626	579,679	2.8

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- Laramie County is the most populous county in Wyoming with a population that reflects 16.4 percent of the total population in the state.
- Most of the AA population (65.2 percent) is concentrated in the city of Cheyenne. The city of Cheyenne is the largest city in the state, serves as the county seat, and is the state capitol of Wyoming.
- According to a community contact, the area has a modestly growing population.

TABLE 14 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Cheyenne MSA	64,589	75,732	17.3
State of Wyoming	65,964	73,194	11.0

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

- According to the 2015 ACS, the AA concentration of LMI households and families along with respective poverty levels were comparable to figures for the state of Wyoming.
- One community contact indicated that wages are generally low, but offset by the low cost of living in the area. The best paying jobs are in energy, government, and health care.

TABLE 15 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Cheyenne MSA	169,946	189,950	11.8	668	827	23.8
State of Wyoming	174,000	194,800	12.0	666	789	18.5

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

- The affordability ratio of the AA at 32.0 percent indicates that housing is slightly more affordable than statewide which has a ratio of 30.2 percent.
- The AA has a slightly higher percentage of owner-occupied units at 62.1 percent compared to the state at 58.8 percent while the percentage of AA rental units at 28.3 percent is higher than the state figure at 26.3 percent.
- According to Moody’s Analytics, homebuilding in the AA remains lackluster with the volume of single-family loans remaining relatively flat since 2013. In 2018, 391 permits were issued, compared to 410 in 2013.
- The age of homes in the AA, appears older with a median age of housing stock at 45 years compared to the statewide age of housing at 37 years. The age of homes does not vary by the census tract income-level.
- The moderate-income census tracts contain significantly less owner-occupied units and more rental units compared to the middle- and upper-income census tracts (See the 2017 Cheyenne Demographic Table in Appendix B).
- As a percentage of total housing units, there were significantly more mobile homes in the moderate-income census tracts (27.2 percent) than in the middle-income census tracts (4.9 percent) and upper-income census tracts (1.4 percent).
- Community contacts stated that affordable housing is a concern. Affordable housing is in short supply, and prices are high relative to incomes. Housing development has

not kept pace with demand. Developers working in the area are focused on building single-family dwellings on large lots, not on affordable housing.

- One community contact indicated that available affordable homes are not typically in good condition and need significant improvements. Some LMI individuals cannot afford to finance both the purchase and renovation of the home.

TABLE 16 UNEMPLOYMENT RATES					
Region	2014	2015	2016	2017	2018
Cheyenne MSA	4.3	4.0	4.2	3.7	3.9
State of Wyoming	4.1	4.3	5.3	4.2	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The key industries in the AA are government, military, healthcare, retail, and transportation. The government and transportation sectors are heavily dependent upon energy and mining (coal, natural gas, and oil).
- According to Moody’s Analytics, weaker energy prices have lowered revenues for state and local governments while also putting a strain on transportation companies.
- In addition to federal and state government, major employers include the Francis E. Warren Air Force Base, the Cheyenne Regional Medical Center, the U.S. Army National Guard, Veterans Affairs Medical Center, Sierra Trading Post, Union Pacific Corp., Laramie County Community College, and Simon Contractors.
- According to one community contact, the economy in the Cheyenne area is strong with modest growth and a mix of younger and older residents.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHEYENNE MSA AA

LENDING TEST

Geographic Distribution of Loans

The bank’s geographic distribution of loans reflects reasonable dispersion among the different census tracts within the AA. The bank’s home improvement and multifamily loans were not evaluated in the bank’s performance because of the limited volume of loan activity.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank’s distribution of total mortgage loans in 2017 was comparable to the distribution of loans originated in 2016.

As displayed in Table 17, the bank’s lending in the moderate-income census tracts was comparable to aggregate lending data by both number and dollar, while below the percentage of owner-occupied housing units (demographic figure). Lending opportunities in the moderate-

income census tracts were somewhat limited as the housing units include more rental units and mobile homes. Additionally, these moderate-income census tracts contain a mix of residential units and businesses, including portions of the downtown area and a tract in the southern portion of the city that is more rural. Another census tract includes the Francis E. Warren Air Force Base which provides very limited opportunity for mortgage lending. The limited opportunities affected both home purchase and refinance lending. The bank's lending in middle- and upper-income census tracts was comparable to aggregate lending data by both number and dollar. When compared to the demographic figure, the bank's lending in middle-income census tracts was above the demographic figure by both number and dollar while it was comparable in upper-income tracts.

The evaluation of the dispersion of home mortgage lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The bank's lending in 2017 was consistent with the 2016 performance.

Similar to total home mortgage lending, the bank's home purchase lending was comparable with aggregate lending data by both number and dollar among the moderate-, middle- and upper-income census tracts. Home purchase lending was below the demographic figure by number, and well below by dollar in the moderate-income census tracts. The bank's lending in the middle-income census tracts was above the demographic figure, while it was comparable in upper-income census tracts.

The evaluation of the dispersion of home purchase lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

Home Refinance Lending

The geographic distribution of home refinance lending is reasonable. The distribution of home refinance lending in 2017 reflected a weaker performance than in 2016.

The bank's home refinance lending in moderate-income census tracts by number was below both aggregate lending data and the demographic figure. By dollar, the bank's lending was comparable to aggregate lending data, but was well-below the demographic figure. The majority of lending occurred in middle-income census tracts with both the number and dollar volume well-above both aggregate lending data and the demographic figure. In the upper-income census tracts, the bank's lending was well below aggregate lending data both by number and dollar, while the bank's lending compared against the demographic figure was also well below by number, but only below by dollar.

The evaluation of the dispersion of home refinance lending in 2016 and 2017 did not reveal any significant gaps in lending within the AA.

**TABLE 17
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans			Aggregate HMDA Data		% of Owner- Occupied Units	
		\$(000)	#%	\$%	#%		\$%
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	62	10,060	15.7	12.0	18.6	13.8	22.8
Middle	233	48,559	59.0	58.1	58.3	58.1	50.7
Upper	100	24,975	25.3	29.9	23.1	28.1	26.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	57	9,134	16.4	12.4	19.5	14.2	22.8
Middle	202	42,934	58.0	58.1	59.4	60.0	50.7
Upper	89	21,868	25.6	29.6	21.2	25.8	26.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	808	10.8	11.2	16.5	13.0	22.8
Middle	27	5,007	73.0	69.6	56.8	54.6	50.7
Upper	6	1,375	16.2	19.1	26.7	32.4	26.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	118	11.1	7.7	19.9	14.8	22.8
Middle	4	618	44.4	40.5	52.7	49.4	50.7
Upper	4	789	44.4	51.7	27.3	35.8	26.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans						% of Multifamily Units	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	20.0	3.6	26.7
Middle	0	0	0.0	0.0	40.0	27.7	57.2
Upper	1	943	100.0	100.0	40.0	68.7	16.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2017 FFIEC Census Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank’s lending in the moderate-income census tracts was above the percent of AA businesses operating in those tracts by number and well-above by dollar. However, the bank’s lending in middle-income census tracts was well below the demographic figure by both number and dollar. In upper-income census tracts, the bank’s lending was well-above by number and above by dollar.

The evaluation of the dispersion of small business loans in 2016 and 2017 did reveal some gaps in lending among geographies in the AA, but these gaps were not considered significant. Census tracts without small business loans were largely located in residential areas and the AA’s unknown-income census tract, which encompasses the Cheyenne Regional Airport.

**TABLE 18
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	5	1,276	22.7	29.6	16.4
Middle	8	1,971	36.4	45.6	65.6
Upper	9	1,070	40.9	24.8	17.6
Unknown	0	0	0.0	0.0	0.4
Not Reported	0	0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

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

The bank’s lending has a reasonable penetration among individuals of different income levels and businesses of different sizes. The bank’s home improvement loans were not evaluated in the bank’s performance because of the limited volume of loan activity.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of lending in 2016 reflected better performance than in 2017.

As illustrated in Table 19, the bank’s lending to low-income borrowers was comparable to aggregate lending data both by number and dollar, but both the bank and aggregate lending data were well below the percentage of low-income families (demographic figure). Among moderate-, middle, and upper-income borrowers, the bank’s lending both by number and dollar was above aggregate lending data, but the data is somewhat skewed as aggregate lending data includes a higher percentage of loans in which the borrower income was not reported. The

analysis is also skewed for the sub-products noted below. When compared to the demographic figure, the bank's lending to moderate-income borrowers was well-above by number and comparable by dollar. The bank's lending to middle-income borrowers was above the demographic figure by both number and dollar, while the bank's lending to upper income borrowers was below by number and comparable by dollar.

While both the bank's lending and aggregate lending to low-income borrowers were well below the demographic figure for home mortgage lending, including home purchase and home refinance loans, community contacts indicated that affordable housing in the AA has been in short supply and, if available, the housing stock is not always in good condition. As mentioned previously, the additional costs of rehabbing these units may deter low-income borrowers from applying for and qualifying for credit.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The distribution of lending in 2016 reflected better performance than in 2017.

Similar to overall home mortgage lending, the bank's home purchase lending to low-income borrowers was comparable to aggregate lending data both by number and dollar, but both the bank's lending and aggregate lending data were well below the demographic figure. The bank's lending to moderate-income borrowers by number was comparable to aggregate lending data and well-above the demographic figure. By dollar, the bank's lending was above both aggregate lending data and the demographic figure. The bank's lending to middle-income borrowers was above aggregate lending data and the demographic figure both by number and dollar. The bank's lending to upper-income borrowers was also above aggregate lending data by both number and dollar, while the bank's lending by number was below the demographic figure, yet was comparable by dollar.

Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The distribution of lending in 2016 reflected better performance than in 2017.

The bank's lending by both number and dollar to LMI borrowers was comparable to aggregate lending data. When compared to the demographic figure, the bank's lending to low-income borrowers was well below by both number and dollar while the bank's lending to moderate-income borrowers was comparable to aggregate lending data by number, but below by dollar amount. The bank's lending to middle-income borrowers was comparable to aggregate lending data and the demographic figure by number. The bank's lending to middle-income borrowers by dollar volume was comparable to the demographic figure and above aggregate lending data. The bank's lending to upper-income borrowers was well-above aggregate lending data and demographic data by both number and dollar.

**TABLE 19
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	%	#%	%	
Total Home Mortgage Loans							
Low	14	1,419	3.5	1.7	7.2	3.9	19.5
Moderate	107	18,705	27.1	22.4	22.0	16.8	18.2
Middle	112	25,061	28.4	30.0	22.4	22.2	23.1
Upper	129	33,126	32.7	39.6	27.2	33.7	39.3
Unknown	33	5,283	8.4	6.3	21.1	23.4	0.0
Home Purchase Loans							
Low	11	1,175	3.2	1.6	6.8	3.4	19.5
Moderate	100	17,607	28.7	23.8	24.6	18.7	18.2
Middle	99	22,343	28.4	30.2	22.8	23.6	23.1
Upper	110	29,185	31.6	39.5	26.1	33.3	39.3
Unknown	28	3,626	8.0	4.9	19.7	21.0	0.0
Home Refinance Loans							
Low	2	164	5.4	2.3	8.1	4.9	19.5
Moderate	5	756	13.5	10.5	16.8	12.5	18.2
Middle	9	1,810	24.3	25.2	19.8	17.9	23.1
Upper	18	3,776	48.6	52.5	28.7	34.4	39.3
Unknown	3	684	8.1	9.5	26.6	30.3	0.0
Home Improvement Loans							
Low	1	80	11.1	5.2	7.4	5.0	19.5
Moderate	2	342	22.2	22.4	19.9	14.4	18.2
Middle	4	908	44.4	59.5	32.8	34.2	23.1
Upper	1	165	11.1	10.8	34.8	41.2	39.3
Unknown	1	30	11.1	2.0	5.1	5.3	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	19.5
Moderate	0	0	0.0	0.0	0.0	0.0	18.2
Middle	0	0	0.0	0.0	0.0	0.0	23.1
Upper	0	0	0.0	0.0	0.0	0.0	39.3
Unknown	1	943	100.0	100.0	100.0	100.0	0.0

Source: 2017 FFIEC Census Data
2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. As shown in Table 20, the bank’s lending to small businesses with gross annual revenues of \$1MM or less was well below the percentage of small businesses in the AA, while the bank’s lending to businesses with gross annual revenues over \$1MM was well-above the percent percentage of small businesses in the AA.

However, information for aggregate lenders who report data under the CRA showed lending to small businesses in the AA at 56.3 percent by number and 41.8 percent by dollar. While institutions included in aggregate lending data are not a direct comparison as the bank is not a CRA reporter, these aggregate lending levels are reflective of the overall demand for credit from small businesses in the AA.

Additionally, 68.2 percent of the bank’s loans were originated in amounts of \$250,000 or less, indicating the bank’s willingness to lend to smaller business entities.

TABLE 20 DISTRIBUTION OF 2018 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	12	2,446	54.5	56.7	90.2
Over \$1 Million	10	1,871	45.5	43.3	7.2
Not Known	0	0	0.0	0.0	2.6
Total	22	4,317	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	11	445	50.0	10.3	
\$100,001 – \$250,000	4	694	18.2	16.1	
\$250,001 – \$1 Million	7	3,178	31.8	73.6	
Total	22	4,317	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	6	225	50.0	9.2	
\$100,001 – \$250,000	2	340	16.7	13.9	
\$250,001 – \$1 Million	4	1,881	33.3	76.9	
Total	12	2,446	100.0	100.0	
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The bank’s CD performance demonstrates adequate responsiveness in the Cheyenne MSA AA.

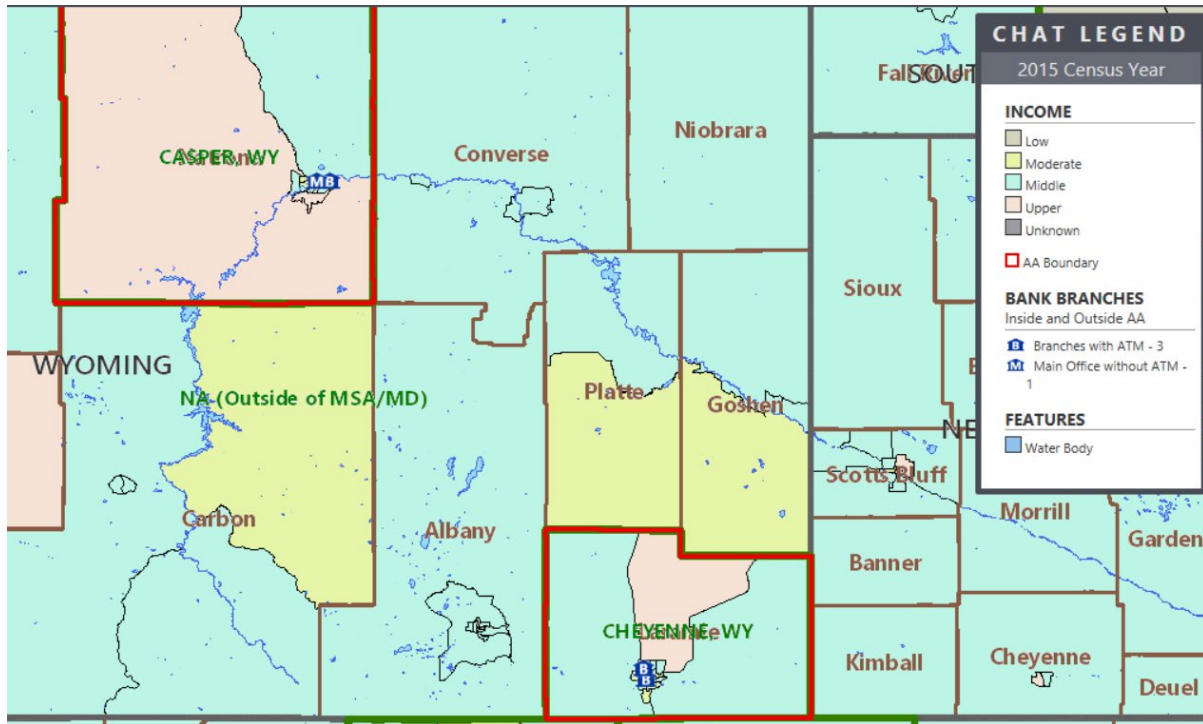
During the evaluation period, the bank originated five loans for \$827,000 in the Cheyenne MSA AA including three loans for \$590,000 for economic development, one loan for \$97,000 for affordable housing, and one loan of \$140,000 for revitalization and stabilization. The bank also had one prior-period investment bond for \$475,000 issued by the Cheyenne Affordable Housing Agency and contributed 18 donations for \$50,000. The donations included 16 donations for \$39,000 to several community service organizations providing help to LMI families and 2 donations for \$11,000 to a private affordable housing organization. Four bank employees also

provided their financial expertise to three organizations that support community services to LMI families. The following are specific examples of CD activities that were responsive to the Cheyenne Metropolitan AA CD needs:

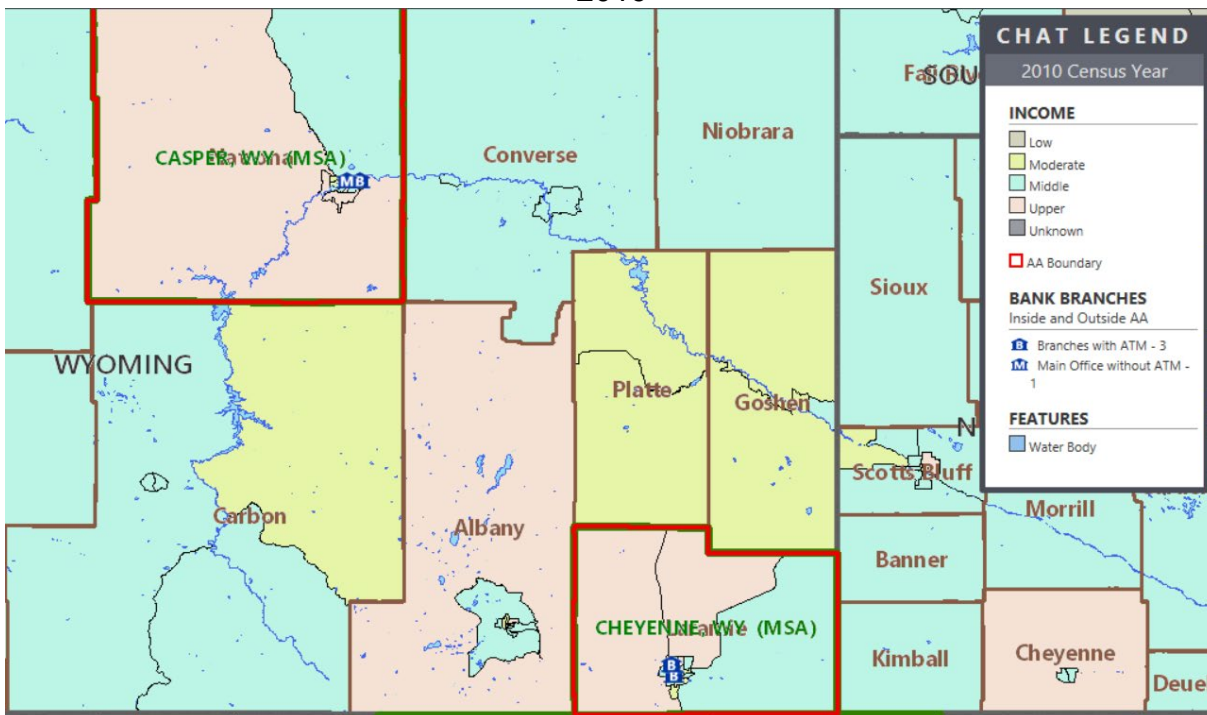
- The bank originated a Small Business Administration loan for \$140,000 to local medical professionals to establish a clinic in a moderate-income census tract providing revitalization and stabilization to the area.
- The bank contributed over \$25,000 to a community service agency supporting young people who come from predominantly LMI families while \$6,500 was provided to another organization that provides job training and placement to low-income single mothers.

APPENDIX A – MAP OF THE ASSESSMENT AREAS

2017-2018



2016



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 CASPER MSA AA 2018 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	20,267	100.0	1,530	7.5	20,267	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,316	21,409	100.0	60.6	10,722	30.4	3,185	9.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	778	18.7	658	17.7	110	25.9	10	30.3
Moderate	415	10.0	336	9.1	75	17.6	4	12.1
Middle	2,278	54.7	2,091	56.4	176	41.4	11	33.3
Upper	695	16.7	623	16.8	64	15.1	8	24.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,166	100.0	3,708	100.0	425	100.0	33	100.0
Percentage of Total Businesses:				89.0		10.2		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6	6.3	5	5.3	1	100.0	0	0.0
Moderate	10	10.4	10	10.5	0	0.0	0	0.0
Middle	37	38.5	37	38.9	0	0.0	0	0.0
Upper	43	44.8	43	45.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	96	100.0	95	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.0		1.0		0.0
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE B-2
CASPER MSA AA 2017 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.6	1,096	5.4	102	9.3	4,282	21.1
Moderate	3	16.7	2,072	10.2	243	11.7	3,331	16.4
Middle	11	61.1	13,885	68.5	1,127	8.1	4,402	21.7
Upper	3	16.7	3,214	15.9	58	1.8	8,252	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	20,267	100.0	1,530	7.5	20,267	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,345	859	4.0	36.6	1,281	54.6	205	8.7
Moderate	3,958	2,175	10.2	55.0	1,494	37.7	289	7.3
Middle	23,836	14,585	68.1	61.2	7,342	30.8	1,909	8.0
Upper	5,177	3,790	17.7	73.2	605	11.7	782	15.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,316	21,409	100.0	60.6	10,722	30.4	3,185	9.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	707	20.5	585	19.5	117	27.6	5	17.9
Moderate	335	9.7	263	8.8	68	16.0	4	14.3
Middle	1,850	53.6	1,662	55.4	174	41.0	14	50.0
Upper	558	16.2	488	16.3	65	15.3	5	17.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,450	100.0	2,998	100.0	424	100.0	28	100.0
Percentage of Total Businesses:			86.9		12.3		0.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	4	5.3	3	4.1	1	50.0	0	0.0
Moderate	4	5.3	4	5.4	0	0.0	0	0.0
Middle	30	39.5	30	40.5	0	0.0	0	0.0
Upper	38	50.0	37	50.0	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	76	100.0	74	100.0	2	100.0	0	0.0
Percentage of Total Farms:			97.4		2.6		0.0	

Source: 2017 FFIEC Census Data
 2017 Dun & Bradstreet Data
 2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-3
CASPER MSA AA 2016 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,680	18.6
Moderate	4	22.2	3,025	15.3	379	12.5	3,815	19.3
Middle	9	50.0	11,110	56.2	539	4.9	4,089	20.7
Upper	5	27.8	5,617	28.4	154	2.7	8,168	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	19,752	100.0	1,072	5.4	19,752	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,179	3,347	16.1	54.2	2,377	38.5	455	7.4
Middle	17,995	11,555	55.4	64.2	4,676	26.0	1,764	9.8
Upper	8,776	5,942	28.5	67.7	1,700	19.4	1,134	12.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	32,950	20,844	100.0	63.3	8,753	26.6	3,353	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,157	30.4	954	28.6	194	43.9	9	29.0
Middle	1,728	45.3	1,556	46.6	157	35.5	15	48.4
Upper	927	24.3	829	24.8	91	20.6	7	22.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,812	100.0	3,339	100.0	442	100.0	31	100.0
Percentage of Total Businesses:				87.6		11.6		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	12.3	8	10.3	2	66.7	0	0.0
Middle	24	29.6	24	30.8	0	0.0	0	0.0
Upper	47	58.0	46	59.0	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	81	100.0	78	100.0	3	100.0	0	0.0
Percentage of Total Farms:				96.3		3.7		0.0

Source: 2016 FFIEC Census Data
 2016 Dun & Bradstreet Data
 2010 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-4
CHEYENNE MSA AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	24,950	100.0	1,781	7.1	24,950	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,256	25,632	100.0	62.1	11,662	28.3	3,962	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	864	16.4	768	16.1	72	18.9	24	17.6
Middle	3,464	65.6	3,113	65.4	261	68.7	90	66.2
Upper	930	17.6	863	18.1	46	12.1	21	15.4
Unknown	20	0.4	18	0.4	1	0.3	1	0.7
Total AA	5,278	100.0	4,762	100.0	380	100.0	136	100.0
Percentage of Total Businesses:				90.2		7.2		2.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	10	5.7	9	5.3	0	0.0	1	100.0
Middle	135	77.1	131	77.1	4	100.0	0	0.0
Upper	30	17.1	30	17.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	175	100.0	170	100.0	4	100.0	1	100.0
Percentage of Total Farms:				97.1		2.3		0.6

Source: 2018 FFIEC Census Data
 2018 Dun & Bradstreet Data
 2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-5
CHEYENNE MSA AA 2017 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	24,950	100.0	1,781	7.1	24,950	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,256	25,632	100.0	62.1	11,662	28.3	3,962	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	682	17.5	581	16.9	68	19.0	33	30.0
Middle	2,432	62.4	2,132	62.1	240	67.2	60	54.5
Upper	771	19.8	707	20.6	48	13.4	16	14.5
Unknown	14	0.4	12	0.3	1	0.3	1	0.9
Total AA	3,899	100.0	3,432	100.0	357	100.0	110	100.0
Percentage of Total Businesses:				88.0		9.2		2.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	5.6	8	5.8	0	0.0	0	0.0
Middle	114	79.7	110	79.1	4	100.0	0	0.0
Upper	21	14.7	21	15.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	143	100.0	139	100.0	4	100.0	0	0.0
Percentage of Total Farms:				97.2		2.8		0.0

Source: 2017 FFIEC Census Data
 2017 Dun & Bradstreet Data
 2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-6
CHEYENNE MSA AA 2016 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,391	18.5
Moderate	6	28.6	6,599	27.8	959	14.5	4,530	19.1
Middle	9	42.9	11,909	50.1	567	4.8	5,678	23.9
Upper	5	23.8	5,263	22.1	63	1.2	9,172	38.6
Unknown	1	4.8	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	23,771	100.0	1,589	6.7	23,771	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	13,032	6,634	26.9	50.9	4,823	37.0	1,575	12.1
Middle	18,209	11,671	47.3	64.1	5,009	27.5	1,529	8.4
Upper	8,433	6,384	25.9	75.7	1,269	15.0	780	9.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	39,674	24,689	100.0	62.2	11,101	28.0	3,884	9.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,959	45.2	1,663	43.1	224	60.2	72	66.7
Middle	1,325	30.6	1,214	31.5	91	24.5	20	18.5
Upper	1,037	23.9	966	25.1	56	15.1	15	13.9
Unknown	15	0.3	13	0.3	1	0.3	1	0.9
Total AA	4,336	100.0	3,856	100.0	372	100.0	108	100.0
Percentage of Total Businesses:				88.9		8.6		2.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	10.1	16	10.3	0	0.0	0	0.0
Middle	111	69.8	107	69.0	4	100.0	0	0.0
Upper	32	20.1	32	20.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	159	100.0	155	100.0	4	100.0	0	0.0
Percentage of Total Farms:				97.5		2.5		0.0

Source: 2016 FFIEC Census Data
2016 Dun & Bradstreet Data
2010 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX C – LENDING TABLES
CASPER MSA AA

TABLE C-1 DISTRIBUTION OF 2016 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY							
Census Tract Income Level	Bank Loans			Aggregate HMDA Data		% of Owner- Occupied Units	
		\$(000)	#%	\$%	#%		\$%
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	15	2,651	8.4	7.5	12.8	10.0	16.1
Middle	107	18,862	59.8	53.3	60.2	57.7	55.4
Upper	57	13,870	31.8	39.2	26.9	32.4	28.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	13	2,162	10.6	8.8	14.2	11.0	16.1
Middle	79	14,265	64.2	58.3	61.7	59.3	55.4
Upper	31	8,049	25.2	32.9	24.1	29.7	28.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	321	2.1	3.4	11.0	8.5	16.1
Middle	25	4,082	52.1	43.8	58.5	55.7	55.4
Upper	22	4,923	45.8	52.8	30.6	35.9	28.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	168	14.3	13.9	8.8	6.5	16.1
Middle	2	140	28.6	11.6	54.4	47.8	55.4
Upper	4	898	57.1	74.5	36.8	45.7	28.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	33.3	34.6	23.0
Middle	1	375	100.0	100.0	66.7	65.4	40.6
Upper	0	0	0.0	0.0	0.0	0.0	36.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data
2010 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-2
DISTRIBUTION OF 2016 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	%	#%	%	
Total Home Mortgage Loans							
Low	10	1,271	5.6	3.6	8.9	4.9	18.6
Moderate	38	4,961	21.2	14.0	21.1	15.5	19.3
Middle	46	9,030	25.7	25.5	22.1	21.8	20.7
Upper	71	17,040	39.7	48.2	24.9	32.6	41.4
Unknown	14	3,081	7.8	8.7	23.0	25.2	0.0
Home Purchase Loans							
Low	6	707	4.9	2.9	10.4	5.6	18.6
Moderate	33	4,136	26.8	16.9	25.7	18.6	19.3
Middle	37	7,270	30.1	29.7	23.3	23.6	20.7
Upper	40	10,784	32.5	44.1	21.5	30.9	41.4
Unknown	7	1,579	5.7	6.5	19.2	21.4	0.0
Home Refinance Loans							
Low	4	564	8.3	6.0	6.7	4.0	18.6
Moderate	5	825	10.4	8.8	14.4	11.1	19.3
Middle	8	1,592	16.7	17.1	19.4	18.5	20.7
Upper	26	5,318	54.2	57.0	28.9	34.7	41.4
Unknown	5	1,027	10.4	11.0	30.6	31.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	8.0	3.4	18.6
Moderate	0	0	0.0	0.0	16.0	10.8	19.3
Middle	1	168	14.3	13.9	32.0	34.1	20.7
Upper	5	938	71.4	77.8	40.0	45.5	41.4
Unknown	1	100	14.3	8.3	4.0	6.2	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	18.6
Moderate	0	0	0.0	0.0	0.0	0.0	19.3
Middle	0	0	0.0	0.0	0.0	0.0	20.7
Upper	0	0	0.0	0.0	0.0	0.0	41.4
Unknown	1	375	100.0	100.0	100.0	100.0	0.0
<p>Source: 2016 FFIEC Census Data 2010 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.</p>							

CHEYENNE MSA AA

TABLE C-3 DISTRIBUTION OF 2016 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY							
Census Tract Income Level	Bank Loans			Aggregate HMDA Data		% of Owner- Occupied Units	
		\$(000)	#%	\$%	#%		\$%
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	82	12,350	20.7	15.3	21.2	16.5	26.9
Middle	226	46,240	57.1	57.3	56.4	54.8	47.3
Upper	88	22,167	22.2	27.4	22.5	28.7	25.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	65	9,854	21.4	15.8	23.8	18.4	26.9
Middle	178	36,968	58.6	59.4	57.4	57.0	47.3
Upper	61	15,443	20.1	24.8	18.8	24.6	25.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	15	2,251	18.3	13.3	17.5	13.8	26.9
Middle	42	8,204	51.2	48.4	55.1	51.4	47.3
Upper	25	6,494	30.5	38.3	27.4	34.8	25.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	245	20.0	15.9	18.2	14.2	26.9
Middle	6	1,068	60.0	69.2	54.7	52.2	47.3
Upper	2	230	20.0	14.9	27.0	33.5	25.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	25.0	13.4	41.6
Middle	0	0	0.0	0.0	37.5	56.0	38.5
Upper	0	0	0.0	0.0	37.5	30.6	19.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data
2010 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-4
DISTRIBUTION OF 2016 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	34	4,434	8.6	5.5	9.5	5.5	18.5
Moderate	115	19,191	29.0	23.8	22.1	17.5	19.1
Middle	101	21,094	25.5	26.1	22.5	23.3	23.9
Upper	111	28,958	28.0	35.9	22.0	27.6	38.6
Unknown	35	7,080	8.8	8.8	23.9	26.1	0.0
Home Purchase Loans							
Low	29	3,749	9.5	6.0	10.0	6.1	18.5
Moderate	97	16,160	31.9	26.0	26.3	21.1	19.1
Middle	81	17,728	26.6	28.5	23.7	26.1	23.9
Upper	80	21,885	26.3	35.1	19.7	26.4	38.6
Unknown	17	2,743	5.6	4.4	20.3	20.4	0.0
Home Refinance Loans							
Low	4	563	4.9	3.3	8.7	4.8	18.5
Moderate	17	2,848	20.7	16.8	15.9	12.1	19.1
Middle	17	2,949	20.7	17.4	19.9	19.1	23.9
Upper	26	6,252	31.7	36.9	23.8	29.0	38.6
Unknown	18	4,337	22.0	25.6	31.7	35.0	0.0
Home Improvement Loans							
Low	1	122	10.0	7.9	8.8	4.5	18.5
Moderate	1	183	10.0	11.9	21.4	15.4	19.1
Middle	3	417	30.0	27.0	30.2	28.5	23.9
Upper	5	821	50.0	53.2	34.4	42.5	38.6
Unknown	0	0	0.0	0.0	5.3	9.1	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	18.5
Moderate	0	0	0.0	0.0	0.0	0.0	19.1
Middle	0	0	0.0	0.0	0.0	0.0	23.9
Upper	0	0	0.0	0.0	0.0	0.0	38.6
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

Source: 2016 FFIEC Census Data
2010 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX D – GLOSSARY

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

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

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

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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-scope 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 United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary

reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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 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.

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.