



PUBLIC DISCLOSURE

March 15, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Rocky Mountain Bank
RSSD# 24453**

**890 West Broadway
Jackson, Wyoming 83001**

**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

Rocky Mountain Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- 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 inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for 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. Lending performance was assessed within the bank's Western Wyoming AA. More weight in the institution's overall CRA rating was placed on small business lending as this product is the bank's strategic focus. The following data was reviewed:

- The bank's 17-quarter average NLTD ratio,
- A statistical sample of 82 small business loans from a universe of 139 loans originated between September 26, 2016 through December 31, 2019, and a sample of 80 home mortgage loans from a universe of 133 loans originated between January 1, 2019 and December 31, 2019.

While small business lending performance was evaluated for multiple years, only 2017-2019 lending data is reflected in the tables in the body of the report, with comparisons made to 2016 performance. The bank's 2016 lending data is located in Appendix C of this report.

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Teton Financial Services, Inc.
- The bank has total assets of \$410.8 million (MM) as of September 30, 2020.

- In addition to its main office in Jackson (Teton County), the bank operates two additional branches located in Pinedale (Sublette County) and Rock Springs (Sweetwater County), Wyoming.
- The Jackson and Rock Springs locations currently offer cash-only automated teller machines (ATMs), while the Pinedale location offers a cash and deposit taking ATM. All ATMs are currently in the process of being converted to full-service interactive teller machines.
- The bank’s primary business focus is commercial lending.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF SEPTEMBER 30, 2020		
Loan Type	\$(000)	%
Commercial	161,411	61.4
Residential Real Estate	70,167	26.7
Consumer	29,378	11.2
Agricultural	1,923	0.7
Other	4	0.0
Gross Loans	262,883	100.0

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

The bank was rated Satisfactory under the CRA at its September 26, 2016 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.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Western Wyoming AA is comprised of Sublette, Sweetwater, and Teton Counties in their entireties (see Appendix A for an AA map).

- The AA consists of ten middle- and eight upper-income census tracts. At the previous examination, the AA was comprised of nine middle-, and nine upper-income census tracts.
- The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report shows the bank has an 8.3 percent market share, ranking fourth out of 14 FDIC-insured depository institutions with 37 branch offices operating within the AA.
- One interview with a member of the community in the bank’s AA was conducted to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented a local community-based development organization.

TABLE 2 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Sublette County, WY	10,247	10,117	(1.3)
Sweetwater County, WY	43,806	44,772	2.2
Teton County, WY	21,294	22,311	4.8
NonMSA Wyoming	396,438	404,237	2.0
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*

- The population growth rate in the AA is generally consistent with the rate for the state of Wyoming. Population fluctuations in both Sublette and Sweetwater Counties correlate to the demand for oil and gas employment in those areas.
- A community contact indicated that although major oil industry companies are closing outlying locations in Wyoming, headquarter operations remain in Sweetwater County. Additionally, the contact stated oil industry retirees remain residents of the area rather than relocating.

TABLE 3 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Sublette County, WY	88,629	87,182	(1.6)
Sweetwater County, WY	86,601	80,723	(6.8)
Teton County, WY	98,655	93,443	(5.3)
State of Wyoming	71,832	73,194	1.9

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- According to the 2015 American Community Survey data, 31.2 percent of AA families were designated as LMI, which is lower than the statewide figure of 38.2 percent.
- The percentage of AA families living below the poverty line, at 6.6 percent, is consistent with the statewide figure of 7.7 percent. However, Teton County contains a significantly lower percentage of families living below the poverty line at 2.4 percent.

**TABLE 4
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Sublette County, WY	278,300	275,600	(1.0)	964	1,171	21.5
Sweetwater County, WY	169,500	190,900	12.6	801	892	11.4
Teton County, WY	723,700	689,000	(4.8)	915	1,113	21.6
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’s affordability¹ ratio at 30.9 percent was consistent with the state of Wyoming’s affordability ratio of 30.2 percent, with Teton County’s affordability ratio significantly lower at 10.9 percent.
- The percentage of owner-occupied units throughout the AA is low, with Teton County at 37.7 percent, Sublette County at 45.6 percent, and Sweetwater County at 62.2 percent. The remainder of the housing stock in the AA is classified as either rental properties or “vacant” homes that generally consist of second homes in this tourism-driven market. This characteristic is indicative of a low available inventory for primary home purchases.

**TABLE 5
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Sublette County, WY	5.3	6.5	4.5	4.1	4.4
Sweetwater County, WY	4.8	6.1	4.5	4.0	3.9
Teton County, WY	3.9	3.5	2.8	2.9	2.7
State of Wyoming	4.3	5.4	4.2	3.9	3.6

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The largest employment industries in Teton County include accommodation and food services, followed by health care and social assistance.
- The major industries in Sublette County and Sweetwater County include mining, quarrying, and oil and gas extraction.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

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 AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on their

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

product offerings and locations within the AA. The bank's NLTD ratio is within the range of ratios of comparable institutions, which is considered reasonable.

TABLE 6 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			17-Quarter Average
Rocky Mountain Bank	Jackson, WY	410,764	82.5
RSNB Bank	Rock Springs, WY	393,827	34.8
Bank of Jackson Hole	Jackson, WY	1,178,032	82.7
State Bank	Green River, WY	29,526	52.1

Assessment Area Concentration

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

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Mortgage Loans	57	32,161	71.3	73.1	23	11,860	28.8	26.9
Small Business Loans	63	14,183	76.8	67.0	19	6,976	23.2	33.0
Total Loans	120	46,344	74.1	71.1	42	18,836	25.9	28.9

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 AA by income level of census tracts. The bank's geographic distribution of loans reflects reasonable dispersion among the different census tracts within the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank's lending was comparable to the percentage of businesses operating in each census tract income level. The bank's 2016 lending was generally consistent with 2017-2019 lending performance. Loan dispersion was also evaluated, and no significant gaps or lapses in lending were identified.

**TABLE 8
DISTRIBUTION OF 2017-2019 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	0	0	0.0	0.0	0.0
Middle	36	9,964	61.0	78.1	60.1
Upper	23	2,794	39.0	21.9	39.9
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank's lending is comparable to the percentage of owner-occupied units in the middle-income census tracts and exceeds the percentage of owner-occupied units in the upper-income census tracts. Loan dispersion was also evaluated, and no significant gaps or lapses in lending were identified.

**TABLE 9
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Owner- Occupied Units
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	24	15,504	42.1	48.2	54.1
Upper	33	16,658	57.9	51.8	45.9
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data
2011-2015 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

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 a reasonable penetration among borrowers of different income levels and businesses of different sizes.

Small Business Lending

The distribution of small business lending is reasonable. As shown in Table 10, the bank’s lending was below the percentage of total businesses operating in the AA with revenues of \$1MM or less. Although the bank does not report CRA data, a review of 2019 aggregate small business lending data reported by all AA CRA filers indicated that 46.1 percent of loans by number and 36.8 percent by dollar were made to small businesses. Additionally, almost 75.0 percent of the bank’s loans made were in amounts of \$250,000 or less, illustrating the bank’s willingness to lend to smaller businesses which typically do not have the need or capacity to borrower larger dollar amounts. The bank’s 2016 lending was generally consistent with 2017-2019 lending performance. Lower lending levels may indicate a lack of demand for credit from small businesses during the period reviewed.

TABLE 10 DISTRIBUTION OF 2017-2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES					
	Bank Loans				Total Businesses
	#	\$(000)	#%	%	%
By Revenue					
\$1 Million or Less	29	6,544	49.2	51.3	87.9
Over \$1 Million	29	6,198	49.2	48.6	10.9
Not Known	1	16	1.7	0.1	1.2
Total	59	12,758	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	32	1,829	54.2	14.3	
\$100,001 – \$250,000	12	2,276	20.3	17.8	
\$250,001 – \$1 Million	14	8,653	25.4	67.8	
Total	59	12,758	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	16	816	55.2	12.5	
\$100,001 – \$250,000	5	950	17.2	14.5	
\$250,001 – \$1 Million	8	4,779	27.6	73.0	
Total	29	6,544	100.0	100.0	
<i>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>NOTE: Percentages may not add up to 100.0 due to rounding.</i>					

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. As noted in Table 11, both the number and dollar volume of lending to LMI borrowers was below the percent of LMI families in the AA. Home mortgage lending to middle-income borrowers was consistent with AA demographics, while lending to upper-income borrowers exceeded the demographic figure. Teton County, which includes the bank’s headquarters and accounts for most of the bank’s credit demand, has higher median housing values and a much lower housing affordability ratio and supply of owner-occupied properties than other areas in the AA. Further, the bank faces strong competition from nine other FDIC-insured depository

institutions operating 18 offices in Teton County. These factors may contribute to a lack of demand for the bank’s home mortgage loans from LMI borrowers.

Although the bank does not report Home Mortgage Disclosure Act (HMDA) data, a review of 2019 aggregate HMDA lending data reported by all AA HMDA filers indicated that 3.2 percent of loans by number and 1.1 percent of loans by dollar were made to low-income borrowers and 12.8 percent of loans by number and 4.5 percent of loans by dollar were made to moderate-income borrowers. Lower aggregate lending levels may indicate a lack of demand for home mortgage loans from LMI borrowers, which supports the reasonable rating for the bank’s lending.

**TABLE 11
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				% of Families
	#	\$(000)	#%	\$%	
Low	3	744	5.3	2.3	15.5
Moderate	3	572	5.3	1.8	15.7
Middle	14	3,116	24.6	9.7	21.1
Upper	37	27,730	64.9	86.2	47.7
Unknown	0	0	0.0	0.0	0.0

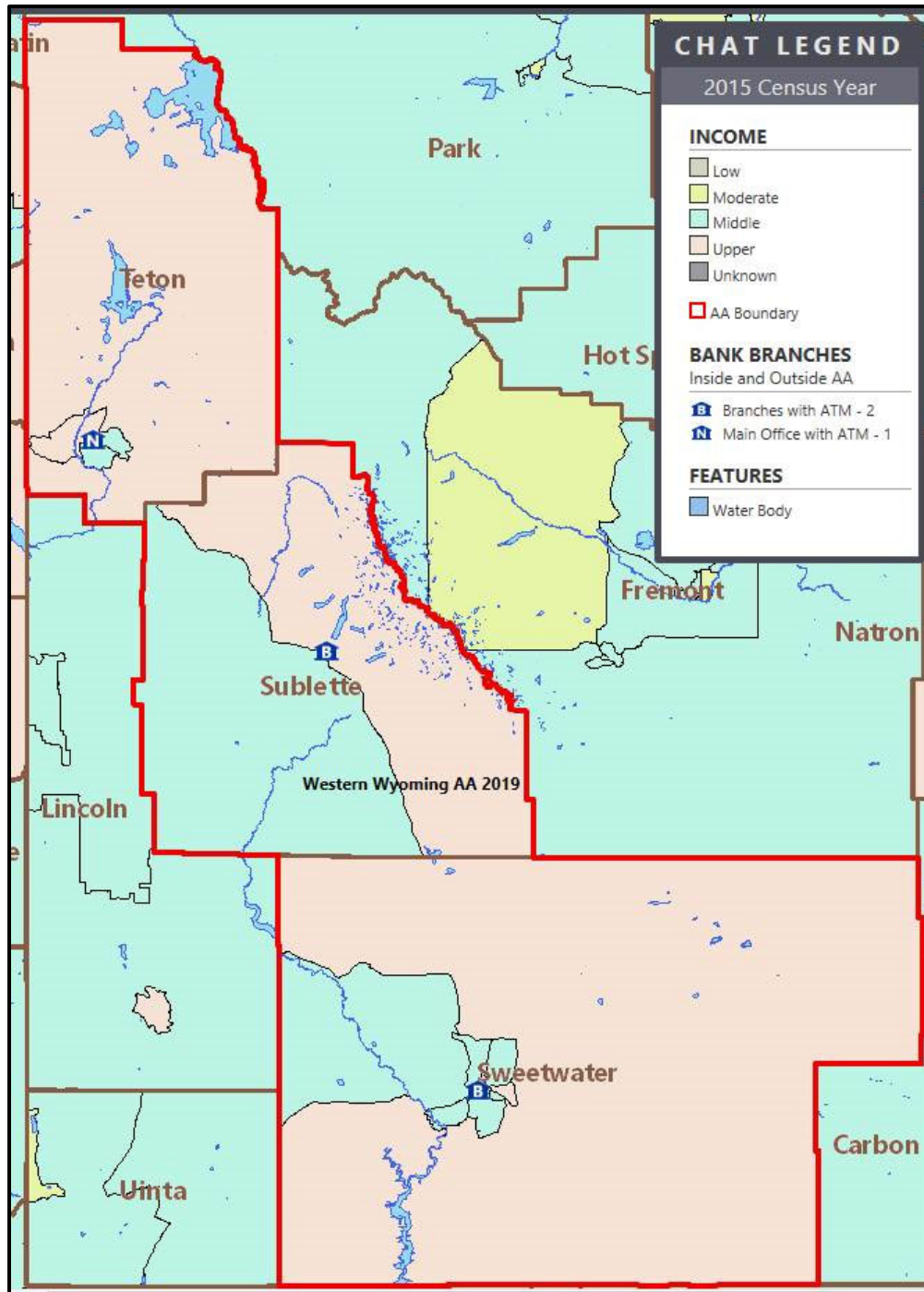
Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

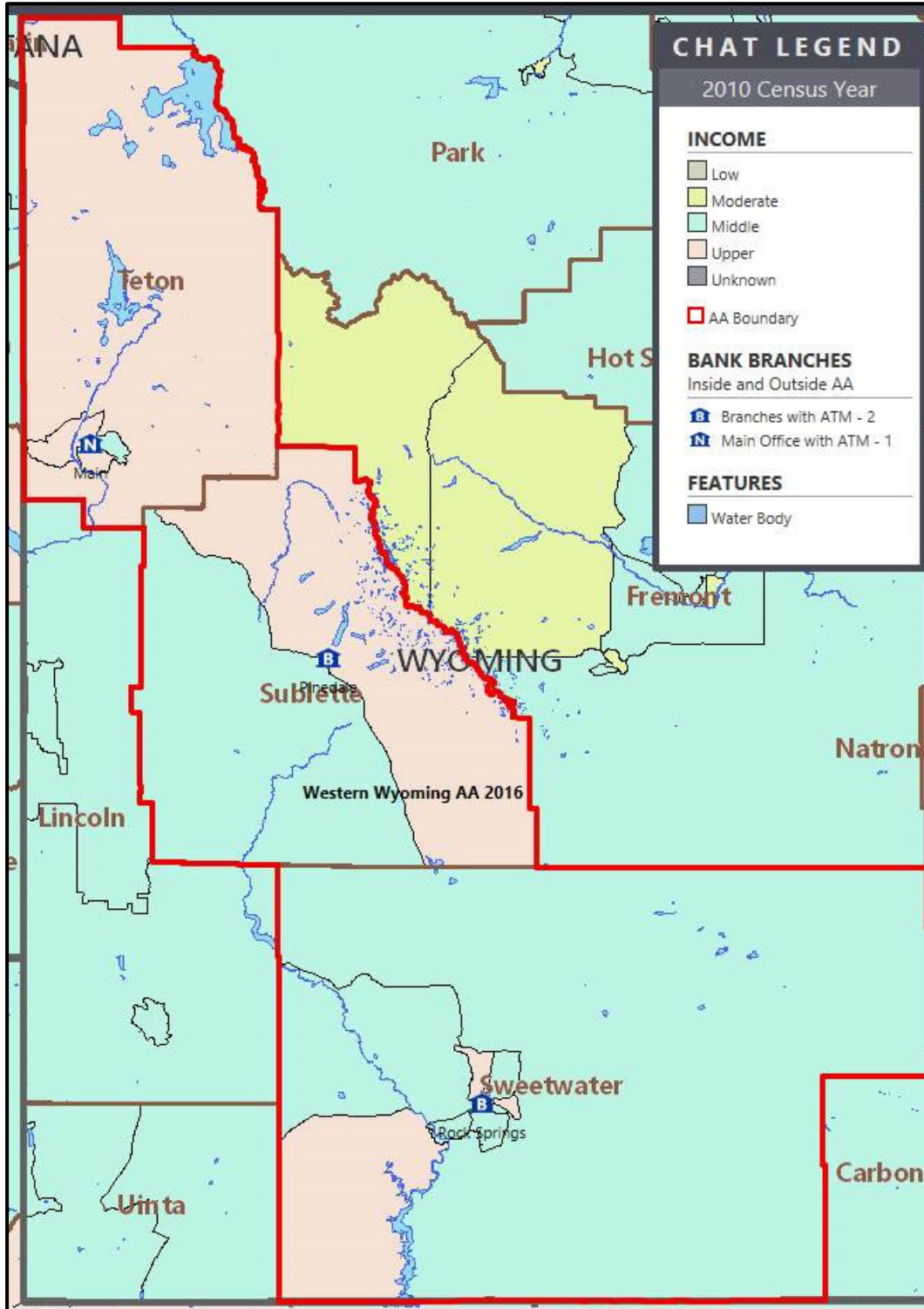
An evaluation of the bank’s fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal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

APPENDIX A – MAP OF THE ASSESSMENT AREA

2017-2019 Western Wyoming AA



2016 Western Wyoming AA



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 2019 WESTERN WYOMING AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,928	15.5
Moderate	0	0.0	0	0.0	0	0.0	2,968	15.7
Middle	10	55.6	10,728	56.7	866	8.1	3,993	21.1
Upper	8	44.4	8,187	43.3	379	4.6	9,026	47.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,915	100.0	1,245	6.6	18,915	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	19,747	10,524	54.1	53.3	5,516	27.9	3,707	18.8
Upper	18,284	8,934	45.9	48.9	3,515	19.2	5,835	31.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	38,031	19,458	100.0	51.2	9,031	23.7	9,542	25.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,475	60.1	2,172	60.0	271	60.6	32	65.3
Upper	1,641	39.9	1,448	40.0	176	39.4	17	34.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,116	100.0	3,620	100.0	447	100.0	49	100.0
Percentage of Total Businesses:				87.9		10.9		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	57	55.9	56	55.4	1	100.0	0	0.0
Upper	45	44.1	45	44.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	102	100.0	101	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.0		1.0		0.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE B-2
2018 WESTERN WYOMING AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,928	15.5
Moderate	0	0.0	0	0.0	0	0.0	2,968	15.7
Middle	10	55.6	10,728	56.7	866	8.1	3,993	21.1
Upper	8	44.4	8,187	43.3	379	4.6	9,026	47.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,915	100.0	1,245	6.6	18,915	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	19,747	10,524	54.1	53.3	5,516	27.9	3,707	18.8
Upper	18,284	8,934	45.9	48.9	3,515	19.2	5,835	31.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	38,031	19,458	100.0	51.2	9,031	23.7	9,542	25.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,558	62.0	2,245	61.9	281	62.2	32	66.7
Upper	1,568	38.0	1,381	38.1	171	37.8	16	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,126	100.0	3,626	100.0	452	100.0	48	100.0
Percentage of Total Businesses:				87.9		11.0		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	59	54.6	58	54.7	1	50.0	0	0.0
Upper	49	45.4	48	45.3	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	108	100.0	106	100.0	2	100.0	0	0.0
Percentage of Total Farms:				98.1		1.9		0.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-3
2017 WESTERN WYOMING AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,928	15.5
Moderate	0	0.0	0	0.0	0	0.0	2,968	15.7
Middle	10	55.6	10,728	56.7	866	8.1	3,993	21.1
Upper	8	44.4	8,187	43.3	379	4.6	9,026	47.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,915	100.0	1,245	6.6	18,915	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	19,747	10,524	54.1	53.3	5,516	27.9	3,707	18.8
Upper	18,284	8,934	45.9	48.9	3,515	19.2	5,835	31.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	38,031	19,458	100.0	51.2	9,031	23.7	9,542	25.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	2,046	58.3	1,762	58.3	253	58.0	31	66.0
Upper	1,461	41.7	1,262	41.7	183	42.0	16	34.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,507	100.0	3,024	100.0	436	100.0	47	100.0
Percentage of Total Businesses:				86.2		12.4		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	49	53.8	49	54.4	0	0.0	0	0.0
Upper	42	46.2	41	45.6	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	91	100.0	90	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0

Source: 2017 FFIEC Census Data
2017 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-4
2016 WESTERN WYOMING AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,635	14.4
Moderate	0	0.0	0	0.0	0	0.0	2,500	13.7
Middle	9	50.0	7,158	39.1	437	6.1	3,844	21.0
Upper	9	50.0	11,149	60.9	561	5.0	9,328	51.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,307	100.0	998	5.5	18,307	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	13,345	7,602	40.1	57.0	3,681	27.6	2,062	15.5
Upper	22,455	11,352	59.9	50.6	4,398	19.6	6,705	29.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,800	18,954	100.0	52.9	8,079	22.6	8,767	24.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,514	38.7	1,308	38.3	179	40.6	27	51.9
Upper	2,397	61.3	2,110	61.7	262	59.4	25	48.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,911	100.0	3,418	100.0	441	100.0	52	100.0
Percentage of Total Businesses:				87.4		11.3		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	53	51.0	53	51.5	0	0.0	0	0.0
Upper	51	49.0	50	48.5	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	104	100.0	103	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.0		1.0		0.0
<p>Source: 2016 FFIEC Census Data 2016 Dun & Bradstreet Data 2006-2010 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

APPENDIX C – 2016 LENDING TABLES

TABLE C-1 DISTRIBUTION OF 2016 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	0	0	0.0	0.0	0.0
Middle	1	550	25.0	38.6	38.7
Upper	3	875	75.0	61.4	61.3
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data
2016 Dun & Bradstreet Data
2006-2010 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 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES					
	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	3	625	75.0	43.9	87.4
Over \$1 Million	1	800	25.0	56.1	11.3
Not Known	0	0	0.0	0.0	1.3
Total	4	1,425	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	2	75	50.0	5.3	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	2	1,350	50.0	94.7	
Total	4	1,425	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	2	75	66.7	12.0	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	1	550	33.3	88.0	
Total	3	625	100.0	100.0	

Source: 2016 FFIEC Census Data
2016 Dun & Bradstreet Data
2006-2010 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 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 refinancing of home improvement and home purchase loans.

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

Limited-scope review: Performance is analyzed using only quantitative factors (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) 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.