



## **PUBLIC DISCLOSURE**

July 15, 2024

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

RNB State Bank  
RSSD# 548052

220 Fifth Street  
Rawlins, Wyoming 82301

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri 64198

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

RNB State 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 areas (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* 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. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's two AAs. Both the Carbon County AA and North Central Colorado Metropolitan AA were assessed using a full-scope review. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio;
- A statistical sample of 48 small business loans, from a universe of 63 loans, originated between January 1, 2023 and December 31, 2023; and,
- A statistical sample of 48 motor vehicle loans, from a universe of 63 loans, originated between January 1, 2023 and December 31, 2023.

In determining the overall institution rating, the bank's lending performance in the state of Wyoming carried the greatest weight given the higher volume of reported loans and deposits, greater market share, and number of branch locations in the state. Additionally, greater emphasis was placed on small business lending given the bank is primarily a commercial lender.

**DESCRIPTION OF INSTITUTION**

RNB State Bank is a community bank headquartered in Rawlins, Wyoming. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of Carbon County Holding Company.
- The bank has two affiliates, Allen Insurance and Freedom Funds Management. There is minimal activity between the bank and the affiliates.
- The bank has total assets of \$252.1 million as of March 31, 2024.
- In addition to the main office, the bank has a second office in Rawlins and two additional offices located in Saratoga and Hanna, Wyoming, as well as a fifth office in Longmont, Colorado. The bank also operates a loan production office (LPO) in Winter Park, Colorado.
- The bank operates five cash-only automated teller machines (ATMs) at each of its office locations, as well as one additional cash-only ATM at a grocery store in Rawlins.
- As shown in the table below, the bank’s primary business focus is commercial lending.

**Table 1**

<b>Composition of Loan Portfolio as of March 31, 2024</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	4,928	3.4
Farmland	8,881	6.1
1- to 4-Family Residential Real Estate	34,982	24.0
Multifamily Residential Real Estate	1,716	1.2
Nonfarm Nonresidential Real Estate	75,775	51.9
Agricultural	5,109	3.5
Commercial and Industrial	9,850	6.7
Consumer	4,079	2.8
Other	712	0.5
<b>Gross Loans</b>	<b>146,032</b>	<b>100.0</b>

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

The bank was rated Satisfactory under the CRA at its August 3, 2020 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 CRITERIA<sup>1</sup>**

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the states of Wyoming and Colorado, including the single AA located in each of the states, respectively.

The bank’s overall lending test performance is Satisfactory. This is based on a reasonable NLTD ratio, a majority of loans originated within the bank’s AAs, a reasonable geographic distribution, and an excellent borrower distribution of loans. As previously noted, the state of Wyoming and small business lending was given more weight in the analysis.

**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 similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and areas of operation in proximity to the bank’s AA.

The bank’s NLTD ratio is reasonable. As illustrated in Table 2, the bank’s 17-quarter average NLTD ratio of 60.5 percent is within the range of the other similarly situated banks whose NLTD ratios ranged from 34.6 percent to 99.0 percent.

**Table 2**

<b>Comparative NLTD Ratios March 31, 2020-March 31, 2024</b>			
<b>Institution</b>	<b>Location</b>	<b>Asset Size \$(000)</b>	<b>NLTD Ratio (%)</b>
			<b>17 Quarter Average</b>
<b>RNB State Bank</b>	Rawlins, Wyoming	252,097	60.5
<b>Similarly Situated Institutions</b>			
Uinta Bank	Mountain View, Wyoming	256,505	34.6
North Valley Bank	Thornton, Colorado	248,883	99.0
Bank of Commerce	Rawlins, Wyoming	193,526	54.5
First American State Bank	Greenwood, Colorado	289,471	89.4
Redstone Bank	Centennial, Colorado	254,112	70.0

<sup>1</sup> The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to states, multistate metropolitan areas, and assessment areas.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AAs.

**Table 3**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Motor Vehicle	48	100.0	928	100.0	0	0.0	0	0.0
Small Business	37	77.1	5,691	67.0	11	22.9	2,806	33.0
<b>Total Loans</b>	<b>85</b>	<b>88.5</b>	<b>6,619</b>	<b>70.2</b>	<b>11</b>	<b>11.5</b>	<b>2,806</b>	<b>29.8</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. The distribution by income level of census tracts in Wyoming and Colorado is reasonable.

**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 excellent distribution among individuals of different income levels and businesses of different sizes. The bank’s lending to borrowers of different income levels and to businesses of different revenue sizes in the state of Colorado is reasonable, while the distribution of loan products in Wyoming is excellent.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## **STATE OF WYOMING**

### **COMMUNITY REINVESTMENT ACT RATING FOR WYOMING: Satisfactory**

This rating is based on the following conclusions with respect to the performance criteria:

- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.

### **SCOPE OF EXAMINATION**

The scope of the review for the state of Wyoming was consistent with the overall scope for the institution. A full-scope review was conducted for the Carbon County AA and represents the conclusions for the entire state. A sample of 26 small business and 47 motor vehicle loans were used in the analysis.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN WYOMING**

The bank delineates one of its two AAs and operates four of its five branches in the state of Wyoming. Loan and deposit products offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial lending.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE CARBON COUNTY AA**

The bank's Carbon County AA consists of Carbon County in its entirety (see Appendix B for an AA map and Appendix C for additional demographic data).

- The AA delineation remains unchanged since the prior evaluation.
- The AA is comprised of one moderate- and four middle-income census tracts, which is consistent with the composition at the prior evaluation.
- The bank operates two offices in Rawlins, one office in Saratoga, and one office in Hanna. Additionally, the bank operates four cash-only ATMs at each of the branch locations and one additional stand-alone cash-only ATM in Rawlins.
- According to the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked first of three FDIC-insured depository institutions operating from six offices in the AA, with a deposit market share of 48.5 percent.
- To further augment the CRA performance evaluation, a member of the local community was interviewed to ascertain relevant area credit needs, local

economic conditions, the responsiveness of the area banks in meeting those credit needs, and current demographic characteristics. The community member represents an economic development organization.

**Table 4**

<b>Population Change</b>			
<b>Assessment Area: Carbon County</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Carbon County	15,739	14,537	(7.6)
NonMSA Wyoming	404,237	396,384	(1.9)
Wyoming	579,679	576,851	(0.5)

*Source: 2020 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey*

- As illustrated in Table 4, the AA experienced a significantly greater decrease in population than NonMSA Wyoming (rural areas statewide) and the state of Wyoming overall.
- Over half of the AA's population is concentrated in Rawlins.

**Table 5**

<b>Median Family Income Change</b>			
<b>Assessment Area: Carbon County</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Carbon County	77,181	75,740	(1.9)
NonMSA Wyoming	79,576	81,346	2.2
Wyoming	79,970	81,290	1.7

*Source: 2011-2015 U.S. Census Bureau: American Community Survey  
2016-2020 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- As illustrated in Table 5, the AA experienced a decrease in median family income (MFI), while rural areas statewide and the state of Wyoming experienced an increase from 2015 to 2020.
- The portion of families in the AA living below the poverty level was 9.7 percent, which exceeded that of rural areas statewide and the state of Wyoming, at 6.9 percent and 6.7 percent, respectively.



**Table 6**

Housing Cost Burden Assessment Area: Carbon County						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Carbon County	41.6	14.7	20.8	56.6	20.5	15.9
NonMSA Wyoming	62.3	19.6	32.1	48.0	25.7	16.3
Wyoming	64.9	22.2	34.1	51.1	27.6	16.9

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy*

- The AA housing affordability ratio<sup>2</sup> of 33.4 percent indicates higher affordability when compared to rural areas statewide and the state of Wyoming, at 28.0 percent and 28.6 percent, respectively.
- The housing cost burden for all homeowners in the AA, rural areas statewide, and the state of Wyoming is comparable. However, the housing cost burden is lower for low- and moderate-income renters in the AA when compared to rural areas statewide and the state of Wyoming.

**Table 7**

Unemployment Rates Assessment Area: Carbon County					
Area	2018	2019	2020	2021	2022
Carbon County	3.7%	3.5%	4.6%	4.1%	3.7%
NonMSA Wyoming	4.0%	3.7%	5.7%	4.5%	3.5%
Wyoming	4.1%	3.7%	5.9%	4.6%	3.6%

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- The unemployment rate in the bank’s AA remained relatively consistent with the rural areas statewide and state of Wyoming figures, with a slight increase in 2020 as a result of the global pandemic.
- A member of the community stated that the primary employers in the area are the Union Pacific Railroad and HF Sinclair.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE CARBON COUNTY AA**

The AA’s overall lending test performance is Satisfactory. This conclusion was reached based on a reasonable geographic distribution of loans and an excellent borrower distribution of loans.

<sup>2</sup> The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is poor. As illustrated in Table 8, the bank’s lending by number and dollar is below the percent of area businesses operating in the moderate-income tract. Although the bank is not a CRA reporter, and therefore a direct comparison cannot be made, a review of aggregate lending data submitted by CRA reporters in the bank’s AA was utilized as additional context in understanding the credit demand by income level of census tracts in the AA. This aggregate lending data noted an aggregate lending distribution of 8.4 percent of loans by number and 11.4 percent by dollar to the moderate-income tract, which is above the bank’s distribution.

An analysis of dispersion revealed no significant gaps or lapses in lending within the AA.

**Table 8**

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Carbon County					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	1	3.8	15	0.6	6.4
Middle	25	96.2	2,439	99.4	93.6
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	26	100.0	2,454	100.0	100.0

Source: 2023 FFIEC Census Data  
2023 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

Motor Vehicle Lending

The geographic distribution of motor vehicle lending is excellent. As illustrated in Table 9 below, the bank’s lending by number and dollar volume was above the percentage of households in the moderate-income census tract.

An analysis of dispersion revealed no significant gaps or lapses in lending within the AA.

**Table 9**

Distribution of 2023 Motor Vehicle Lending By Income Level of Geography					
Assessment Area: Carbon County					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	9	19.1	180	19.5	10.6
Middle	38	80.9	741	80.5	89.4
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>47</b>	<b>100.0</b>	<b>921</b>	<b>100.0</b>	<b>100.0</b>

Source: 2023 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

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

The bank’s lending has a excellent distribution among individuals of different income levels and businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is excellent. The percent of small business loans to businesses with \$1 million or less in revenues is comparable to the percentage of area businesses with revenues of \$1 million or less (demographic figure). When reviewing the bank’s small business lending by loan amount, 84.6 percent of the bank’s loans were originated in amounts of \$250,000 or less, which reflects the bank’s willingness to meet the credit needs of small businesses in the AA. While not a direct comparator as the bank is not a CRA reporter, a review of aggregate lending data submitted by CRA reporters in the bank’s AA was utilized as additional context in understanding the credit demand by the size of businesses in the AA. This aggregate lending data noted an aggregate lending distribution of 43.4 percent of loans by number and 26.5 percent by dollar to small businesses, which further supports the bank’s excellent small business lending performance.

**Table 10**

<b>Distribution of 2023 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Carbon County</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	23	88.5	1,608	65.5	89.9
<b>Over \$1 Million</b>	3	11.5	846	34.5	7.4
<b>Revenue Unknown</b>	0	0.0	0	0.0	2.6
<b>Total</b>	26	100.0	2,454	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	21	80.8	804	32.8	
<b>\$100,001 - \$250,000</b>	1	3.8	204	8.3	
<b>\$250,001 - \$1 Million</b>	4	15.4	1,446	58.9	
<b>Total</b>	26	100.0	2,454	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	20	87.0	744	46.3	
<b>\$100,001 - \$250,000</b>	1	4.3	204	12.7	
<b>\$250,001 - \$1 Million</b>	2	8.7	660	41.0	
<b>Total</b>	23	100.0	1,608	100.0	
<i>Source: 2023 FFIEC Census Data 2023 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Motor Vehicle Lending**

The borrower distribution of motor vehicle lending is excellent. As illustrated in the table below, the bank’s lending by number and dollar volume was above the percent of low- and moderate-income households in the AA.

**Table 11**

<b>Distribution of 2023 Motor Vehicle Lending By Borrower Income Level</b>					
<b>Assessment Area: Carbon County</b>					
<b>Borrower Income Level</b>	<b>Bank Loans</b>				<b>Households by Household Income %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	17	36.2	263	28.6	26.7
<b>Moderate</b>	14	29.8	247	26.8	15.6
<b>Middle</b>	5	10.6	152	16.5	17.3
<b>Upper</b>	11	23.4	259	28.1	40.5
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Total</b>	47	100.0	921	100.0	100.0
<i>Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

## **STATE OF COLORADO**

### **COMMUNITY INVESTMENT ACT RATING FOR COLORADO: Satisfactory**

This rating is based on the following conclusions with respect to the performance criteria:

- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among businesses of different sizes.

### **SCOPE OF EXAMINATION**

The scope of the review for Colorado was comparable to the overall scope for the institution; however, motor vehicle loans were not evaluated based on the low volume of motor vehicle loans originated in the AA, which would not have produced a meaningful analysis. A full-scope review was conducted for the North Central Colorado Metropolitan AA. A sample of 11 small business loans was used in the analysis.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO**

The bank delineates one of its two AAs and operates one of its five branches in the state of Colorado. Additionally, the bank operates one LPO in Winter Park, Colorado. Loan and deposit products offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial lending.

### **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTH CENTRAL COLORADO METROPOLITAN AA**

The bank's North Central Colorado Metropolitan AA consists of Adams, Arapahoe, Boulder, Broomfield, Denver, and Jefferson counties in their entirety as well as portions of Larimer and Weld counties (see Appendix B for an AA map and Appendix C for additional demographic data).

- The previous AA in Colorado, which included portions of Boulder, Larimer, and Weld Counties, was expanded to include Adams, Arapahoe, Boulder, Broomfield, Denver, and Jefferson counties. Additionally, the AA was expanded to include the entirety of Boulder County and contracted the portion of Larimer County previously included.
- The AA is comprised of 41 low-, 185 moderate-, 273 middle-, 207 upper-, and 22 unknown-income census tracts. At the previous evaluation on August 3, 2020, the AA had 3 low-, 17 moderate-, 17 middle-, and 16 upper-income census tracts.

- The bank operates one full-service branch in Longmont, Colorado. Additionally, the bank operates one cash-only ATM at the Longmont branch.
- According to the June 30, 2023 FDIC Summary of Deposit Market Share Report, the bank ranked 64 out of 79 FDIC-insured depository institutions operating from 765 offices in the AA, with a deposit market share of less than 0.1 percent.
- To further augment the CRA performance evaluation, an interview with a member of the community that was recently conducted as part of the CRA evaluation of another financial institution with offices in the bank’s AA was reviewed to ascertain the credit needs of the area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member represents an economic development organization.

**Table 12**

<b>Population Change</b>			
<b>Assessment Area: North Central Colorado Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
North Central Colorado Metropolitan	3,241,420	3,565,991	10.0
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Boulder County, CO	310,032	330,758	6.7
Broomfield County, CO	60,699	74,112	22.1
Denver County, CO	649,654	715,522	10.1
Jefferson County, CO	552,344	582,910	5.5
Larimer County, CO	318,227	359,066	12.8
Weld County, CO	270,948	328,981	21.4
Denver-Aurora-Lakewood, CO MSA	2,703,972	2,963,821	9.6
Colorado	5,278,906	5,773,714	9.4
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- The AA experienced a comparable increase in population from 2015 to 2020 to the Denver-Aurora-Lakewood, CO MSA (MSA) and the state of Colorado.
- More than half of the state of Colorado’s total population in 2015 and 2020 resides within the bank’s AA.

**Table 13**

<b>Median Family Income Change</b>			
<b>Assessment Area: North Central Colorado Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
North Central Colorado Metropolitan	83,945	97,672	16.4
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Boulder County, CO	105,899	118,307	11.7
Broomfield County, CO	106,948	129,207	20.8
Denver County, CO	76,243	93,236	22.3
Jefferson County, CO	94,579	108,867	15.1
Larimer County, CO	84,004	96,221	14.5
Weld County, CO	76,980	85,167	10.6
Denver-Aurora-Lakewood, CO MSA	88,302	103,157	16.8
Colorado	81,753	92,752	13.5
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- Growth in the AA’s MFI from 2015 to 2020 was comparable to the MSA figure, but higher than that of the state of Colorado.
- The portion of families in the AA living below the poverty level was 5.7 percent, compared to the MSA and the state of Colorado, at 5.3 percent and 6.1 percent, respectively.

**Table 14**

<b>Housing Cost Burden</b>						
<b>Assessment Area: North Central Colorado Metropolitan</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
North Central Colorado Metropolitan	80.8	48.1	47.2	64.3	37.2	21.2
Adams County, CO	83.3	44.4	50.7	66.2	35.1	24.0
Arapahoe County, CO	84.3	52.2	49.2	67.4	37.8	21.7
Boulder County, CO	83.9	57.4	53.0	65.3	39.5	21.0
Broomfield County, CO	83.8	72.0	41.9	56.1	38.5	16.7
Denver County, CO	76.6	44.7	42.9	65.9	34.6	21.9
Jefferson County, CO	83.1	50.3	47.8	60.2	36.7	18.8
Larimer County, CO	81.0	44.5	48.7	58.1	37.8	19.8
Weld County, CO	75.0	38.7	44.7	66.7	42.8	23.3
Denver-Aurora-Lakewood, CO MSA	81.0	49.5	46.2	65.3	37.3	21.0
Colorado	79.7	47.9	46.5	63.2	37.3	21.4
<i>Cost Burden is housing cost that equals 30 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i>						
<i>Note: All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.</i>						

- The median housing value in the AA, at \$406,466, is comparable to the MSA figure of \$411,757, but is higher than the statewide figure of \$369,900.
- The AA housing affordability ratio of 19.7 percent indicates slightly lower affordability when compared to the MSA and the state of Colorado, at 20.2 percent and 20.3 percent, respectively.
- A member of the community stated that the growing population in Colorado has negatively impacted affordability.



**Table 15**

<b>Unemployment Rates</b>					
<b>Assessment Area: North Central Colorado Metropolitan</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
North Central Colorado Metropolitan	2.9	2.5	6.9	5.5	3.0
Adams County, CO	3.2	2.8	7.5	6.2	3.4
Arapahoe County, CO	3.0	2.6	7.3	5.8	3.1
Boulder County, CO	2.6	2.3	5.7	4.4	2.5
Broomfield County, CO	2.7	2.4	6.1	4.6	2.6
Denver County, CO	2.9	2.6	7.6	5.9	3.1
Jefferson County, CO	2.8	2.5	6.6	5.1	2.8
Larimer County, CO	2.6	2.3	5.9	4.7	2.7
Weld County, CO	2.8	2.5	6.5	5.8	3.2
Denver-Aurora-Lakewood, CO MSA	2.9	2.6	7.0	5.5	3.0
Colorado	3.0	2.7	6.8	5.4	3.0

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*  
*Note: All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.*

- The unemployment rate in the AA has consistently mirrored the MSA and the state of Colorado.
- The primary industries in the AA are in construction, healthcare, science, and technology.
- A member of the community stated there is a need for flexible capital products and credit education for small businesses.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE NORTH CENTRAL COLORADO METROPOLITAN AA**

The AA’s overall lending test performance is Satisfactory. This conclusion was reached based on a reasonable geographic distribution of loans and a reasonable borrower distribution of loans.

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. As illustrated in Table 16, there were no small business loans originated in the low-income census tracts. However, the percentage of loans originated in the moderate-income census tracts was above the percentage of area businesses operating in the moderate-income tracts.

An analysis of the dispersion revealed a lapse in lending in LMI tracts. However, limited loan volume and significant competition provided context for this lapse in lending.

**Table 16**

<b>Distribution of 2023 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: North Central Colorado Metropolitan</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	4.2
<b>Moderate</b>	4	36.4	1,416	43.7	22.4
<b>Middle</b>	3	27.3	637	19.7	35.7
<b>Upper</b>	3	27.3	684	21.1	34.8
<b>Unknown</b>	1	9.1	500	15.4	2.8
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	11	100.0	3,237	100.0	100.0

Source: 2023 FFIEC Census Data  
2023 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Lending to Businesses of Different Sizes**

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with annual revenues under \$1 million was below the percentage of total businesses. While not a direct comparator, as the bank is not a CRA reporter, a review of aggregate lending data submitted by CRA reporters in the bank’s AA was referenced for additional context in understanding the credit demand by the size of businesses in the AA. This aggregate lending data noted an aggregate lending distribution of 47.2 percent of loans by number and 27.1 percent by dollar to small businesses, indicating limited demand for small business credit products.

**Table 17**

<b>Distribution of 2023 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: North Central Colorado Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	5	45.5	961	29.7	92.7
<b>Over \$1 Million</b>	6	54.5	2,276	70.3	6.3
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.9
<b>Total</b>	11	100.0	3,237	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	4	36.4	200	6.2	
<b>\$100,001 - \$250,000</b>	3	27.3	637	19.7	
<b>\$250,001 - \$1 Million</b>	4	36.4	2,400	74.1	
<b>Total</b>	11	100.0	3,237	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	3	60.0	140	14.6	
<b>\$100,001 - \$250,000</b>	1	20.0	237	24.7	
<b>\$250,001 - \$1 Million</b>	1	20.0	584	60.8	
<b>Total</b>	5	100.0	961	100.0	
<i>Source: 2023 FFIEC Census Data            2023 Dun &amp; Bradstreet Data            2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

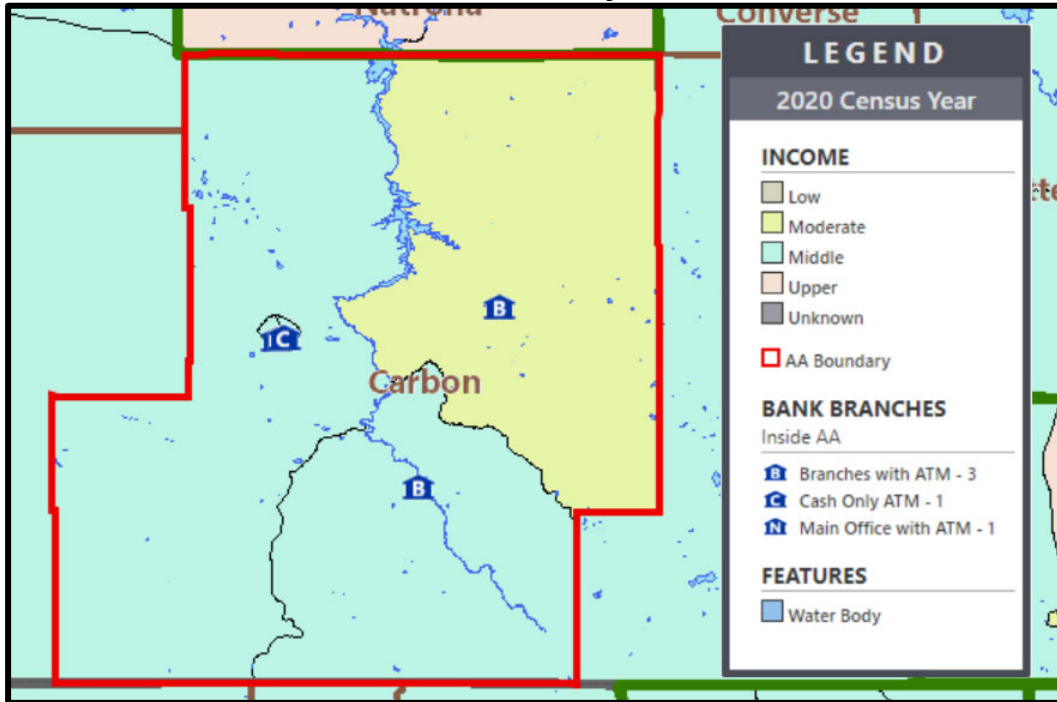
**APPENDIX A – SCOPE OF EXAMINATION TABLE**

**Table A-1**

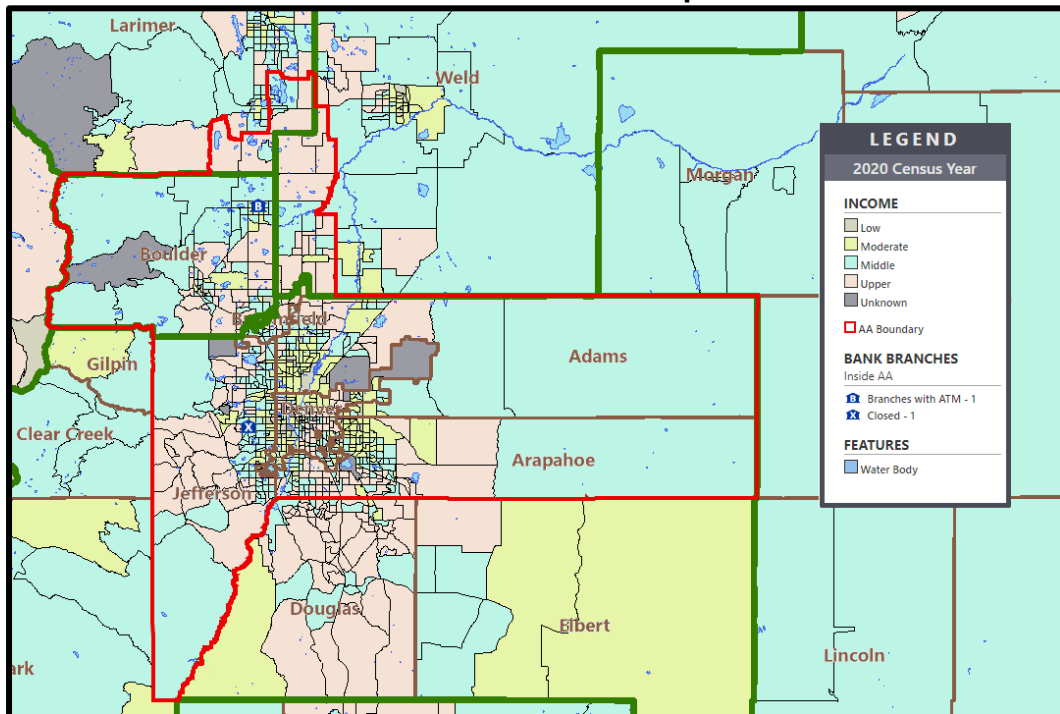
<b>SCOPE OF EXAMINATION</b>		
<b><u>FINANCIAL INSTITUTION</u></b> RNB State Bank Rawlins, Wyoming	<b><u>PRODUCTS/SERVICES REVIEWED</u></b> <ul style="list-style-type: none"> <li>• Small Business</li> <li>• Motor Vehicle</li> </ul>	
<b><u>TIME PERIODS REVIEWED</u></b>		
<u>Small Business:</u>	January 1, 2023 – December 31, 2023	
<u>Motor Vehicle:</u>	January 1, 2023 – December 31, 2023	
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>		
<b>AFFILIATES</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>
None		
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>		
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAM</b>	<b>BRANCHES VISITED</b>
<u>Wyoming</u> Carbon County AA	Full Review	None
<u>Colorado</u> North Central Colorado Metropolitan AA	Full Review	None

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

Carbon County AA



North Central Colorado Metropolitan AA



APPENDIX C – DEMOGRAPHIC INFORMATION

Table C-1

2023 Carbon County 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	975	23.6
Moderate	1	20.0	448	10.8	37	8.3	779	18.9
Middle	4	80.0	3,683	89.2	363	9.9	977	23.7
Upper	0	0.0	0	0.0	0	0.0	1,400	33.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5</b>	<b>100.0</b>	<b>4,131</b>	<b>100.0</b>	<b>400</b>	<b>9.7</b>	<b>4,131</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,292	411	9.3	31.8	248	19.2	633	49.0
Middle	7,517	3,987	90.7	53.0	1,580	21.0	1,950	25.9
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8,809</b>	<b>4,398</b>	<b>100.0</b>	<b>49.9</b>	<b>1,828</b>	<b>20.8</b>	<b>2,583</b>	<b>29.3</b>
	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	44	6.4	37	6.0	2	3.9	5	27.8
Middle	641	93.6	579	94.0	49	96.1	13	72.2
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>685</b>	<b>100.0</b>	<b>616</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.9</b>		<b>7.4</b>		<b>2.6</b>
	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	15.9	10	16.4	0	0.0	0	0.0
Middle	53	84.1	51	83.6	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>63</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.8</b>		<b>3.2</b>		<b>0.0</b>
<small>Source: 2023 FFIEC Census Data 2023 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</small>								

**Table C-2**

2023 North Central Colorado Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	41	5.6	31,552	4.6	6,066	19.2	146,684	21.4
Moderate	185	25.4	177,779	26.0	16,477	9.3	128,671	18.8
Middle	273	37.5	261,483	38.2	10,257	3.9	149,955	21.9
Upper	207	28.4	208,958	30.5	4,705	2.3	259,349	37.9
Unknown	22	3.0	4,887	0.7	1,185	24.2	0	0.0
<b>Total AA</b>	<b>728</b>	<b>100.0</b>	<b>684,659</b>	<b>100.0</b>	<b>38,690</b>	<b>5.7</b>	<b>684,659</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	62,207	21,576	3.0	34.7	37,471	60.2	3,160	5.1
Moderate	323,004	157,401	22.1	48.7	149,856	46.4	15,747	4.9
Middle	451,157	287,821	40.4	63.8	143,850	31.9	19,486	4.3
Upper	325,481	240,581	33.8	73.9	70,605	21.7	14,295	4.4
Unknown	18,608	4,381	0.6	23.5	12,430	66.8	1,797	9.7
<b>Total AA</b>	<b>1,180,457</b>	<b>711,760</b>	<b>100.0</b>	<b>60.3</b>	<b>414,212</b>	<b>35.1</b>	<b>54,485</b>	<b>4.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,950	4.2	7,131	4.1	754	6.3	65	3.7
Moderate	42,024	22.4	38,680	22.2	3,055	25.6	289	16.3
Middle	67,027	35.7	63,012	36.2	3,431	28.8	584	32.9
Upper	65,361	34.8	60,700	34.9	3,906	32.8	755	42.5
Unknown	5,318	2.8	4,466	2.6	768	6.4	84	4.7
<b>Total AA</b>	<b>187,680</b>	<b>100.0</b>	<b>173,989</b>	<b>100.0</b>	<b>11,914</b>	<b>100.0</b>	<b>1,777</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.7</b>		<b>6.3</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	47	2.5	40	2.2	7	17.5	0	0.0
Moderate	308	16.3	299	16.2	9	22.5	0	0.0
Middle	754	39.9	746	40.3	7	17.5	1	100.0
Upper	742	39.2	727	39.3	15	37.5	0	0.0
Unknown	40	2.1	38	2.1	2	5.0	0	0.0
<b>Total AA</b>	<b>1,891</b>	<b>100.0</b>	<b>1,850</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>2.1</b>		<b>0.1</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent 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, 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 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 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.

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**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 Consolidated Reports of Condition and Income (Call Report) instructions. 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.