



PUBLIC DISCLOSURE

March 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Platte Valley Bank
RSSD# 580155

2201 Main Street
Torrington, Wyoming 82240

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.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating 2

Scope of Examination 2

Description of Institution 3

Conclusions with Respect to Performance Tests.....4

Fair Lending or Other Illegal Credit Practices Review 7

Southeast Wyoming Nonmetropolitan Assessment Area (Full-Scope Review)

 Description of Institution’s Operations 8

 Conclusions with Respect to Performance Tests 11

Casper Metropolitan Assessment Area (Full-Scope Review)

 Description of Institution’s Operations 19

 Conclusions with Respect to Performance Tests 21

Cheyenne Metropolitan Assessment Area (Limited-Scope Review)

 Description of Institution’s Operations 28

 Conclusions with Respect to Performance Tests 28

Appendix A – Map of the Assessment Areas 29

Appendix B – Demographic Information..... 32

Appendix C – Limited-Scope Review Assessment Area Tables 36

Appendix D – Glossary..... 42

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

Platte Valley Bank (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 Tests:

- The bank's net loan-to-deposit ratio (NLTD) is more than 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 a reasonable 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.
- Community development (CD) activity reflects adequate responsiveness to the CD needs of the bank's AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate 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. Performance was assessed within the bank's three AAs. The Southeast Wyoming AA and the Casper Metropolitan Statistical Area (MSA) AA were assessed using a full-scope review. The Cheyenne MSA AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 19-quarter average NLTD ratio;
- A statistical sample of 177 small business loans from a universe of 1,364 loans originated from January 1, 2020 through December 31, 2020. Small business lending included loans originated by the bank's lending affiliate, C.H. Brown Company, LLC (C.H. Brown).
- The universe of 523 home mortgage loans reported on the bank's 2019 and 2020 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers.

- CD loans, qualified investments, and CD services from July 25, 2017 to July 1, 2021.

For this evaluation, more weight was placed on the bank’s performance within the Southeast Wyoming AA when determining the overall institution rating given the bank’s loan and deposit volumes and deposit market share. In terms of products, small business and home mortgage lending were weighted equally.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Torrington, Wyoming. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of Plate Valley Financial Service Companies, Inc., headquartered in Scottsbluff, Nebraska.
- The bank has one lending subsidiary, C.H. Brown, which provides financing for an array of agricultural, industrial, transportation, and construction equipment. This subsidiary operates in a niche market and provides financing nationwide.
- The bank has total assets of \$566.4 million (MM) as of September 30, 2021.
- In addition to its main office in Torrington, the bank operates five additional locations in Wyoming with two locations in Cheyenne, one location in Wheatland, and two locations in Casper.
- All locations have drive-up facilities and full-service automated teller machines (ATMs). Additionally, two off-site cash-only ATMs are located within the cities of Torrington and Wheatland.
- As shown in the table below, the bank’s primary business focus is commercial and residential real estate lending.

Table 1

Composition of Loan Portfolio as of September 30, 2021		
Loan Type	\$(000)	%
Construction and Land Development	26,997	6.3
Farmland	51,730	12.0
1- to 4-Family Residential Real Estate	84,404	19.7
Multifamily Residential Real Estate	5,182	1.2
NonFarm Non-Residential Real Estate	67,176	15.6
Agricultural	23,567	5.5
Commercial and Industrial	137,696	32.1
Consumer	27,946	6.5
Other	4,628	1.1
Gross Loans	429,326	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 July 24, 2017 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 TESTS¹

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Southeast Wyoming AA and Casper MSA AA (full-scope reviews); and a brief discussion of performance in the Cheyenne MSA AA (limited-scope review). Lastly, the bank's performance for CD lending, qualified investments and donations, and CD services was reviewed for all three AAs.

LENDING TEST

The bank's overall performance under the lending test is reasonable based on a more than reasonable NLTD ratio, a majority of loans originated within the bank's AAs, and a reasonable geographic and borrower distribution of loans within each of the bank's three AAs. More consideration was given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served.

Additionally, for home mortgage lending, emphasis was placed on the bank's performance in comparison to aggregate lending data (aggregate lending) rather than in comparison to respective demographic figures, as aggregate lending is considered representative of credit demand.

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, market share, and location.

The bank's NLTD ratio is more than reasonable as it is higher than the range of NLTD ratios reported by four other similarly situated institutions.

¹ 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 assessment areas.

Table 2

Comparative NLTD Ratios March 31, 2017 – September 30, 2021			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			19 Quarter Average
Platte Valley Bank	Torrington, Wyoming	566,416	95.3
Similarly Situated Institutions			
First Northern Bank of Wyoming	Buffalo, Wyoming	549,984	75.9
Security State Bank	Basin, Wyoming	427,708	66.3
Wyoming Bank and Trust Company	Cheyenne, Wyoming	285,456	56.5
RNB State Bank	Rawlins, Wyoming	245,376	60.9

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of total loans, including total HMDA loans, by number and dollar, inside the AAs. However, the bank originated a majority of its small business loans outside its AAs, primarily attributed to the bank's lending affiliate, C.H. Brown, which conducts equipment lending activities on a nationwide scale. Excluding these loans, the bank originated the majority of its small business lending inside the AA with 59 loans at 66.3 percent by number totaling approximately \$2.9MM at 64.6 percent by dollar.

Table 3

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase – Conventional	123	84.2	25,312	81.9	23	15.8	5,606	18.1
Home Purchase – FHA	65	89.0	11,118	90.8	8	11.0	1,133	9.2
Home Purchase – VA	15	83.3	3,477	83.5	3	16.7	687	16.5
Multi-Family Housing	4	100.0	2,633	100.0	0	0.0	0	0.0
Loan Purpose Not Applicable	11	84.6	1,933	80.3	2	15.4	473	19.7
Other Purpose Closed-End	13	100.0	88	100.0	0	0.0	0	0.0
Refinancing	228	89.1	46,034	89.2	28	10.9	5,555	10.8
Total HMDA related	459	87.8	90,595	87.1	64	12.2	13,454	12.9
Small Business	59	33.3	2,874	37.1	118	66.7	4,872	62.9
Total Small Business related	59	33.3	2,874	37.1	118	66.7	4,872	62.9
Total Loans	518	74.0	93,469	83.6	182	26.0	18,326	16.4

Note: Percentages may not total 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 geographic distribution of lending reflects

reasonable penetration throughout the Southeast Wyoming AA and the Casper MSA AA. Lending in the Cheyenne MSA AA was consistent with the lending performance in the full scope review 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 and businesses of different sizes. The bank's lending has a reasonable penetration among individuals of different income levels and businesses of different sizes in the Southeast Wyoming AA and Casper MSA AA. Lending performance in the Cheyenne MSA AA was consistent with the lending performance in the full scope review 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. For this evaluation, examples of qualified CD activities included:

- The bank originated 227 Small Business Association Paycheck Protection Program (PPP) loans totaling \$8.9MM for either economic development or revitalization and stabilization.
- The bank originated one loan totaling \$40M to an organization that preserves small farms and the livestock industry within the bank's Cheyenne MSA AA.
- The bank purchased seven municipal bonds for \$1.4MM that benefited infrastructure needs in two communities located in underserved nonmetropolitan middle-income census tracts.
- The bank demonstrated support to its communities through 17 donations for \$39,450 to entities that included community food banks, advocates for children, local Meals on Wheels programs, local chambers of commerce, and economic development councils.
- Some bank employees provided financial expertise to organizations that focus on economic development and provide advocacy services and after-school programs for LMI children.
- In addition, given the bank's responsiveness to area credit needs, consideration was also given to 16 PPP loans totaling \$663M that took place outside of the bank's AA, but within the state of Wyoming.

Table 4

Community Development Activity									
Assessment Area: All Assessment Areas									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
	#	\$(000)	Investments		Donations		Total Investments		
			#	\$(000)	#	\$(000)	#	\$(000)	
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	10	17	10	17	7
Economic Development	185	7,805	0	0	4	2	4	2	6
Revitalization and Stabilization	43	1,195	7	1,370	3	20	10	1,390	3
Totals	228	9,000	7	1,370	17	39	24	1,409	16

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 the 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.

**SOUTHEAST WYOMING ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN SOUTHEAST WYOMING
AA**

The bank's Southeast Wyoming AA consists of Goshen and Platte Counties in their entirety. (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA is comprised of two moderate- and four middle-income census tracts.
- At the previous examination, the AA was comprised of five moderate- and one middle-income census tracts.
- According to the FFIEC's List of Distressed and Underserved Nonmetropolitan Middle-Income Census Tracts, one census tract in Platte County has been classified as underserved since 2018.
- The AA includes the Torrington main office in Goshen County and the Wheatland Branch in Platte County. Each location includes drive-through facilities and onsite full-service ATMs.
- The bank operates two off-site cash dispensing ATMs, with one located at a Torrington, Wyoming, grocery store and the other in a Wheatland, Wyoming, gas station.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked second of seven FDIC-insured depository institutions operating in the AA, with a total deposit market share of 31.2 percent.
- To further augment the CRA performance evaluation, one interview was conducted with a member of the community within the bank's AA to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization focused on affordable housing needs within the AA.

Table 5

Population Change			
Assessment Area: Southeast Wyoming			
Area	2010 Population	2015 Population	Percent Change
Southeast Wyoming AA	21,916	22,294	1.7
Goshen County, WY	13,249	13,544	2.2
Platte County, WY	8,667	8,750	1.0
NonMSA Wyoming	396,438	404,237	2.0
Wyoming	563,626	579,679	2.8

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

- According to the 2015 American Community Survey (ACS) five-year average, the AA's population of 22,294 residents accounts for 3.8 percent of the statewide population and 5.5 percent of the nonmetropolitan population.
- The main population centers in the AA include the towns of Torrington (6,736 residents) and Wheatland (3,639 residents).
- The population of residents aged 65 and older account for 21.0 percent of the AA's population which is above the statewide figure of 13.5 percent and the nonmetropolitan figure of 13.6 percent.

Table 6

Median Family Income Change			
Assessment Area: Southeast Wyoming			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Southeast Wyoming AA	56,200	58,483	4.1
Goshen County, WY	56,602	56,948	0.6
Platte County, WY	56,363	58,427	3.7
NonMSA Wyoming	73,003	72,833	(0.2)
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
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- According to the 2015 ACS five-year average, 49.7 percent of families in the AA are LMI, which is above the statewide and nonmetropolitan figures at 38.2 percent and 38.5 percent, respectively.
- The percentage of families living below the poverty line in the AA, at 13.7 percent, is also above the statewide figure of 7.7 percent and the nonmetropolitan figure of 7.9 percent. The percentage of LMI families living below the poverty line is comparable in both Platte and Goshen Counties with figures at 13.8 percent and 13.6 percent, respectively.

Table 7

Housing Cost Burden						
Assessment Area: Southeast Wyoming						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Southeast Wyoming AA	56.0	10.9	30.7	57.0	17.5	19.4
Goshen County, WY	54.1	9.7	28.9	60.3	16.6	19.3
Platte County, WY	58.5	13.8	33.3	52.7	18.7	19.6
NonMSA Wyoming	64.8	18.6	32.6	50.4	26.4	16.9
Wyoming	68.2	24.6	34.7	52.6	27.5	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), 2013-2017 Comprehensive Housing Affordability Strategy

- Median gross rent in the AA at \$647 is below the statewide figure of \$789 and nonmetropolitan figure at \$767.
- The median housing value in the AA at \$152,162 is below the statewide figure of \$194,800 and the nonmetropolitan figure of \$200,821.
- The AA has a lower percentage of rental units at 20.0 percent compared to the state and nonmetropolitan figures of 26.3 percent and 25.2 percent, respectively.
- According to the community member, there is a limited stock of affordable homes in the area as many of these homes are being purchased by out of state residents who have moved to the area at an above market price. As a result, LMI families and individuals may find it challenging to purchase a home within their budgets.

Table 8

Unemployment Rates					
Assessment Area: Southeast Wyoming					
Area	2016	2017	2018	2019	2020
Southeast Wyoming AA	4.0	3.3	3.5	3.7	4.6
Goshen County, WY	3.5	3.0	3.3	3.8	4.3
Platte County, WY	4.8	3.8	3.7	3.6	5.0
NonMSA Wyoming	5.3	4.2	4.0	3.7	5.6
Wyoming	5.4	4.3	4.0	3.7	5.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to the community member, the largest industries in the AA are the oil and energy, healthcare, and education sectors.
- The community member also stated that the largest employers in the AA include Basin Electric Power Cooperative, Laramie River Station, Stallion Oilfield Services, Goshen County Memorial Hospital, Banner Health, Eastern

- Wyoming College, Wyoming Army National Guard Armory, Camp Guernsey Operations, and the Goshen and Platte County School Districts.
- The community member stated there have been no major layoffs in the area; however, it has been difficult to find individuals to work the laborious types of jobs in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTHEAST WYOMING AA

The bank's performance under the lending test in the Southeast Wyoming AA is reasonable. In this AA, the borrower distribution was weighted more as the geographic distribution included only moderate- and middle-income census tracts. In addition, an evaluation of the bank's home improvement, multifamily, other purpose lines of credit (LOC), other purpose closed-end, and purpose not applicable loans was not considered meaningful for the geographic and borrower distribution analyses due to a low volume of originations.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's 2020 lending in moderate-income census tracts by number volume was above both aggregate lenders and the percentage of owner-occupied units (demographic figure). Total home mortgage lending in 2019 was comparable to aggregate lenders and above the demographic figure. In addition, an evaluation of the dispersion of home mortgage loans revealed no significant lending gaps or lapses throughout the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. In 2020, the bank's home purchase lending in moderate-income census tracts by number volume was above both aggregate lenders and the demographic figure. The bank's 2019 geographic distribution of home purchase loans in moderate-income census tracts was comparable to both aggregate lenders and the demographic figure. In addition, an evaluation of the dispersion of home purchase loans revealed no significant lending gaps or lapses throughout the AA.

Home Refinance Loans

The geographic distribution of home refinance loans is excellent. In 2020, the bank's home refinance loans in moderate-income census tracts by number volume was above both aggregate lenders and the demographic figure. The bank's geographic distribution of 2019 home refinance loans by number volume was also above both aggregate lenders and the demographic figure. In addition, an evaluation of the dispersion of home refinance loans revealed no significant lending gaps or lapses throughout the AA.

Table 9

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Southeast Wyoming AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	30	51.7	43.6	5,052	53.3	45.8	37	55.2	40.1	6,476	58.3	43.0	43.5
Middle	28	48.3	56.4	4,424	46.7	54.2	30	44.8	59.9	4,629	41.7	57.0	56.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	9,476	100.0	100.0	67	100.0	100.0	11,105	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	25	61.0	45.3	3,863	65.9	50.3	50	64.9	44.7	9,007	68.5	48.7	43.5
Middle	16	39.0	54.7	2,001	34.1	49.7	27	35.1	55.3	4,140	31.5	51.3	56.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	41	100.0	100.0	5,864	100.0	100.0	77	100.0	100.0	13,147	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	65.0	0	0.0	55.2	0	0.0	60.0	0	0.0	61.7	43.5
Middle	0	0.0	35.0	0	0.0	44.8	0	0.0	40.0	0	0.0	38.3	56.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	14.3	0	0.0	66.7	0	0.0	44.2	38.0
Middle	0	0.0	66.7	0	0.0	85.7	0	0.0	33.3	0	0.0	55.8	62.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	56	54.4	44.2	9,036	58.1	46.9	88	60.3	43.1	15,490	63.8	47.0	43.5
Middle	47	45.6	55.8	6,514	41.9	53.1	58	39.7	56.9	8,772	36.2	53.0	56.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	103	100.0	100.0	15,550	100.0	100.0	146	100.0	100.0	24,262	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is excellent. The bank’s small business lending in moderate-income census tracts was above the percentage of small businesses in moderate-income census tracts. In addition, an evaluation of the dispersion of small business lending revealed no significant lending gaps or lapses throughout the AA.

Table 10

Distribution of 2020 Small Business Lending By Income Level of Geography					
Assessment Area: Southeast Wyoming					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	7	63.6	486	70.7	46.6
Middle	4	36.4	201	29.3	53.4
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	
Total	11	100.0	687	100.0	100.0

*Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. While the bank’s home mortgage lending reflects a reasonable distribution among individuals of different income levels, the bank’s small business lending reflects a poor distribution to businesses of different sizes. Overall, the bank’s lending reflects a reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of total home mortgage lending is reasonable. In 2020, home mortgage lending by number volume to low-income borrowers was above aggregate data but below the percent of low-income families (demographic figure). Lending to moderate-income borrowers was comparable to aggregate lenders but above the demographic figure. In 2019, the bank’s total home mortgage lending was generally consistent with 2020 performance. In 2019, total home mortgage lending to low-income borrowers by number volume was comparable to aggregate lenders but below the demographic figure;

to moderate-income borrowers, the bank's performance was above both aggregate lenders and the demographic figure.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. In 2020, the bank's home purchase lending by number volume to low-income borrowers was comparable to aggregate lenders but below the demographic figure. The bank's home mortgage lending to moderate-income borrowers was above both aggregate lenders and the demographic figure. In 2019, the bank's home purchase lending to LMI borrowers was consistent with 2020 performance.

Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. In 2020, the bank's home refinance loans by number volume to low-income borrowers was above aggregate lenders but below the demographic figure. Lending to moderate-income borrowers by number volume was comparable to both aggregate lenders and the demographic figure. In 2019, the bank's home refinance loans by number volume to low-income borrowers was also above aggregate lenders and below the demographic figure. However, home refinance lending to moderate-income borrowers was above both aggregate lenders and the demographic figure.

Table 11

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Southeast Wyoming AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	8	13.8	13.1	687	7.2	8.0	10	14.9	12.2	906	8.2	7.0	31.6
Moderate	18	31.0	24.1	2,192	23.1	19.7	26	38.8	29.5	3,981	35.8	25.4	18.1
Middle	16	27.6	25.3	2,936	31.0	28.0	18	26.9	18.6	3,378	30.4	19.6	18.4
Upper	16	27.6	17.5	3,661	38.6	23.5	11	16.4	17.3	2,626	23.6	24.0	32.0
Unknown	0	0.0	20.0	0	0.0	20.7	2	3.0	22.4	214	1.9	24.1	0.0
Total	58	100.0	100.0	9,476	100.0	100.0	67	100.0	100.0	11,105	100.0	100.0	100.0
Refinance Loans													
Low	5	12.2	9.7	351	6.0	5.2	6	7.8	5.6	417	3.2	3.2	31.6
Moderate	11	26.8	18.6	1,080	18.4	15.4	11	14.3	15.0	1,504	11.4	11.3	18.1
Middle	9	22.0	22.9	1,578	26.9	22.2	26	33.8	19.8	4,106	31.2	18.9	18.4
Upper	15	36.6	23.6	2,680	45.7	25.8	33	42.9	28.2	7,040	53.5	32.0	32.0
Unknown	1	2.4	25.2	175	3.0	31.3	1	1.3	31.4	80	0.6	34.5	0.0
Total	41	100.0	100.0	5,864	100.0	100.0	77	100.0	100.0	13,147	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	25.0	0	0.0	27.0	0	0.0	6.7	0	0.0	2.6	31.6
Moderate	0	0.0	10.0	0	0.0	4.6	0	0.0	23.3	0	0.0	19.8	18.1
Middle	0	0.0	15.0	0	0.0	9.6	0	0.0	20.0	0	0.0	12.6	18.4
Upper	0	0.0	30.0	0	0.0	33.1	0	0.0	26.7	0	0.0	30.1	32.0
Unknown	0	0.0	20.0	0	0.0	25.6	0	0.0	23.3	0	0.0	34.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	13.6	12.4	1,042	6.7	7.1	17	11.6	8.7	1,326	5.5	4.8	31.6
Moderate	29	28.2	21.1	3,272	21.0	17.6	37	25.3	21.7	5,485	22.6	17.3	18.1
Middle	26	25.2	23.9	4,517	29.0	25.3	45	30.8	19.2	7,491	30.9	18.9	18.4
Upper	31	30.1	20.3	6,341	40.8	24.5	44	30.1	23.2	9,666	39.8	29.2	32.0
Unknown	3	2.9	22.2	378	2.4	25.4	3	2.1	27.3	294	1.2	29.9	0.0
Total	103	100.0	100.0	15,550	100.0	100.0	146	100.0	100.0	24,262	100.0	100.0	100.0
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													
Due to limited volume in the Other Purpose LOC, Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

Small Business Lending

The borrower distribution of small business lending is poor. The bank's lending to businesses with revenues of \$1MM or less by number volume was below the percent of small business in the AA, as well as aggregate lending data. A review of aggregate lending data submitted by CRA reporters in the bank's Southeast Wyoming AA reflected a lending distribution of 67.2 percent by number and 57.3 percent by dollar to small

businesses. While not a direct comparison as the bank is not a CRA reporter, aggregate data is indicative of overall demand for small business credit in the AA.

Overall, the bank’s poor distribution to small businesses did not impact overall conclusions due to the low volume of originations in the AA. In addition, the bank originated ten loans in the amounts of \$100M or less to businesses with revenues of \$1MM or less, which is typically requested by smaller businesses and indicative of the bank’s willingness to lend to smaller entities.

Table 12

Distribution of 2020 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Southeast Wyoming					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	6	54.5	203	29.5	90.8
Over \$1 Million	3	27.3	457	66.5	6.4
Revenue Unknown	2	18.2	26	3.8	2.8
Total	11	100.0	687	100.0	100.0
By Loan Size					
\$100,000 or Less	10	90.9	337	49.1	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	9.1	350	50.9	
Total	11	100.0	687	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	6	100.0	203	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	6	100.0	203	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank’s responsiveness to the CD needs of its AA 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 AA. The bank’s CD performance demonstrates adequate responsiveness. Table 13 outlines the bank’s CD activities. All of the bank’s CD loan originations were PPP loans.

Table 13

Community Development Activity Assessment Area: Southeast Wyoming									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
	#	\$(000)	Investments		Donations		Total Investments		#
			#	\$(000)	#	\$(000)	#	\$(000)	
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	0	0	0	0	0
Economic Development	33	1,276	0	0	4	2	4	2	6
Revitalization and Stabilization	34	342	7	1,370	0	0	7	1,370	3
Totals	67	1,618	7	1,370	4	2	11	1,372	9

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

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CASPER MSA AA

The bank's Casper MSA AA consists of Natrona County in its entirety, which also comprises the entire Casper, Wyoming MSA (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA is comprised of 1 low-, 3 moderate-, 11 middle-, and 3 upper-income census tracts.
- At the previous examination, the AA was comprised of 4 moderate-, 9 middle-, and 5 upper-income census tracts.
- In this AA, the bank has two offices with drive-through facilities and onsite full-service ATMs in the city of Casper, Wyoming.
- Since the previous examination, the bank closed one branch location in Evanston, Wyoming on February 12, 2018, while simultaneously opening the East Casper branch location.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked sixth of nine FDIC-insured depository institutions operating in the AA, with a total deposit market share of 4.2 percent.
- An interview with a member of the community within the bank's AA was conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact represented an organization focused on economic development in the AA.

Table 14

Population Change			
Assessment Area: Casper MSA			
Area	2010 Population	2015 Population	Percent Change
Casper MSA AA	75,450	80,011	6.1
Wyoming	563,626	579,679	2.9

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

- According to the 2015 ACS five-year average, the AA's population accounts for 13.8 percent of the statewide population.
- Natrona County is the second most populous county in the state.
- The county seat is the city of Casper, Wyoming, with a population of 58,817, which accounts for 73.5 percent of the AA's population.

- The community member stated that during the pandemic, the AA had a high in migration of residents from the coastal areas who are able to work remotely. Many residents are moving into the AA due to the abundance of outdoor amenities such as hiking trails, mountains, parks, and wildlife habitats.

Table 15

Median Family Income Change			
Assessment Area: Casper MSA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Casper MSA AA	68,450	71,406	4.3
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
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- According to the 2015 ACS, 37.6 percent of families in the AA are LMI, which is comparable to the 38.2 percent statewide figure.
- The percentage of families living below the poverty level in the AA at 7.6 percent is comparable to the statewide figure of 7.7 percent.

Table 16

Housing Cost Burden						
Assessment Area: Casper MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Casper MSA AA	73.9	29.2	36.0	55.1	31.3	16.3
Wyoming	68.2	24.6	34.7	52.6	27.5	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), 2013-2017 Comprehensive Housing Affordability Strategy

- The median housing value in the AA of \$185,641 is below the statewide figure of \$194,800.
- The AA median rent of \$827 is above the statewide figure of \$789.
- There is a higher percentage of owner-occupied units at 60.6 percent compared to rental units at 30.4 percent. The state figures for owner-occupied units at 58.8 percent is comparable to the AA. The rental units in the state at 26.3 percent is below the AA.
- The median age of housing stock in the AA at 47 years is above the statewide figure of 37 years.
- According to the community member, housing stock for sale in the AA has been very limited over the last few years. Furthermore, the homes that are affordable for LMI residents and not dilapidated are being purchased by out of state buyers at above market prices.

Table 17

Unemployment Rates					
Assessment Area: Casper MSA					
Area	2016	2017	2018	2019	2020
Casper MSA AA	7.2	5.4	4.6	4.0	7.8
Wyoming	5.4	4.3	4.0	3.7	5.8
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- According to the community member, the major industries in the AA are manufacturing, medical equipment, health, construction, education, and energy.
- The community member also stated that the largest employers in the AA are Sinclair Oil Refinery, Automation Electronics, Natrona County School District, Banner Medical Center, and Casper College.
- In addition, the community member indicated the energy sector had major layoffs and tourism declined over the past two years because of the pandemic. Construction work also slowed over the past year due to inflation and the cost of construction materials.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CASPER MSA AA

LENDING TEST

The bank’s performance under the lending test in the Casper MSA AA is reasonable. In addition, due to the overall low volume of total home mortgage loan originations, an evaluation of the bank’s individual mortgage products was not considered meaningful for the geographic and borrower distribution analyses, and these products were analyzed at the total volume level.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts. While some gaps in lending were noted, particularly within the one low-income census tract located in the AA, dispersion is reasonable due to the level of competition in the area.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank did not originate any loans within the AA's low-income census tract in either 2019 or 2020, which was below aggregate lenders and the percent of owner-occupied units (demographic figure). In the AA's moderate-income tracts, the bank's 2020 lending performance by number volume was comparable to aggregate lenders and the demographic figure while it was below both in 2019.

Performance is reasonable as the AA's low-income census tract is comprised of a small residential community in North Casper that only contains 4.0 percent of all owner-occupied units in the AA; the remainder of the tract is primarily commercial. While some gaps in lending were noted in the one low-income tract in the AA, it did not have an impact on the overall conclusion due to the competition in the area.

Table 18

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Casper MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.4	0	0.0	1.3	0	0.0	3.0	0	0.0	1.5	4.0
Moderate	1	3.8	10.9	13	2.5	8.6	2	22.2	11.9	950	32.5	10.4	10.2
Middle	20	76.9	72.8	3,980	75.7	70.9	7	77.8	73.2	1,976	67.5	71.3	68.1
Upper	5	19.2	13.9	1,145	21.8	19.2	0	0.0	11.9	0	0.0	16.7	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	5,256	100.0	100.0	9	100.0	100.0	2,926	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	1.0	0	0.0	1.6	0	0.0	0.8	4.0
Moderate	0	0.0	7.3	0	0.0	5.0	1	2.9	7.7	28	0.4	6.7	10.2
Middle	7	63.6	69.2	939	34.3	65.6	19	55.9	70.2	4,428	55.7	66.9	68.1
Upper	4	36.4	21.5	1,798	65.7	28.3	14	41.2	20.5	3,498	44.0	25.6	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	2,737	100.0	100.0	34	100.0	100.0	7,954	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	3.5	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	0	0.0	5.4	0	0.0	8.0	0	0.0	6.1	0	0.0	5.5	10.2
Middle	0	0.0	64.3	0	0.0	57.3	0	0.0	73.5	0	0.0	69.4	68.1
Upper	0	0.0	26.8	0	0.0	31.2	0	0.0	20.4	0	0.0	25.1	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													
Low	0	0.0	40.0	0	0.0	61.9	0	0.0	14.3	0	0.0	2.7	15.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	9.5	0	0.0	3.6	6.4
Middle	0	0.0	40.0	0	0.0	19.0	0	0.0	61.9	0	0.0	87.6	68.8
Upper	0	0.0	20.0	0	0.0	19.0	0	0.0	14.3	0	0.0	6.1	9.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.3	0	0.0	1.4	0	0.0	2.3	0	0.0	1.2	4.0
Moderate	1	2.6	10.0	13	1.6	7.7	3	6.8	9.9	978	9.0	8.5	10.2
Middle	29	74.4	71.8	4,935	61.6	69.3	27	61.4	72.1	6,414	58.9	69.9	68.1
Upper	9	23.1	15.9	2,943	36.7	21.5	14	31.8	15.6	3,498	32.1	20.4	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	8,009	100.0	100.0	44	100.0	100.0	10,890	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is poor. The bank did not originate any small business loans in the low-income census tract and only originated one loan within the moderate-income census tracts. As such, the bank’s performance in LMI census tracts was below the percentage of small businesses. In addition, the analysis does reveal significant gaps in lending that also impacted the conclusion.

Table 19

Distribution of 2020 Small Business Lending By Income Level of Geography					
Assessment Area: Casper MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	19.2
Moderate	1	5.3	23	2.5	9.7
Middle	8	42.1	352	39.0	52.8
Upper	10	52.6	528	58.5	18.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	19	100.0	903	100.0	100.0

*Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 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

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 distribution among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank made no home mortgage loans to low-income borrowers in 2020, which is below aggregate lending and the percent of low-income families in the AA (demographic figure). However, the bank’s lending performance in 2019 by number volume to low-income borrowers was comparable to aggregate lenders, yet still below the demographic figure. The bank’s lending to moderate-income borrowers by number volume in both 2019 and 2020 was comparable to aggregate lenders and to the demographic figure.

A community member indicated that the inventory of affordable housing loans is limited in the AA. The community member also stated that many LMI borrowers seeking a home

mortgage loan typically utilize the Wyoming Community Development Association, which offers low and no down payment programs for LMI individuals.

Table 20

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Casper MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	2	7.7	7.5	273	5.2	4.0	0	0.0	8.6	0	0.0	4.4	21.7
Moderate	5	19.2	23.2	786	15.0	16.3	2	22.2	25.6	429	14.7	18.6	16.4
Middle	9	34.6	24.3	1,740	33.1	21.1	0	0.0	20.6	0	0.0	19.9	21.7
Upper	10	38.5	27.2	2,457	46.7	37.0	7	77.8	23.6	2,497	85.3	33.3	40.7
Unknown	0	0.0	17.7	0	0.0	21.6	0	0.0	21.6	0	0.0	23.8	0.0
Total	26	100.0	100.0	5,256	100.0	100.0	9	100.0	100.0	2,926	100.0	100.0	100.0
Refinance Loans													
Low	1	9.1	7.4	87	3.2	3.9	0	0.0	4.6	0	0.0	2.5	21.7
Moderate	2	18.2	13.2	31	1.1	10.1	6	17.6	13.4	885	11.1	10.0	16.4
Middle	1	9.1	21.8	325	11.9	19.4	14	41.2	20.0	3,236	40.7	18.0	21.7
Upper	5	45.5	31.7	2,078	75.9	38.6	14	41.2	31.1	3,833	48.2	37.1	40.7
Unknown	2	18.2	25.8	216	7.9	28.0	0	0.0	30.9	0	0.0	32.3	0.0
Total	11	100.0	100.0	2,737	100.0	100.0	34	100.0	100.0	7,954	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	4.2	0	0.0	8.2	0	0.0	5.4	21.7
Moderate	0	0.0	10.7	0	0.0	7.5	0	0.0	12.2	0	0.0	11.1	16.4
Middle	0	0.0	25.0	0	0.0	29.6	0	0.0	22.4	0	0.0	16.3	21.7
Upper	0	0.0	53.6	0	0.0	51.5	0	0.0	49.0	0	0.0	46.6	40.7
Unknown	0	0.0	7.1	0	0.0	7.2	0	0.0	8.2	0	0.0	20.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	7.7	7.2	360	4.5	3.9	0	0.0	6.6	0	0.0	3.5	21.7
Moderate	8	20.5	20.4	823	10.3	14.5	9	20.5	19.5	1,324	12.2	14.2	16.4
Middle	11	28.2	23.7	2,075	25.9	20.5	14	31.8	19.6	3,236	29.7	18.6	21.7
Upper	15	38.5	28.6	4,535	56.6	37.3	21	47.7	26.4	6,330	58.1	34.3	40.7
Unknown	2	5.1	20.1	216	2.7	23.8	0	0.0	28.0	0	0.0	29.4	0.0
Total	39	100.0	100.0	8,009	100.0	100.0	44	100.0	100.0	10,890	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to small businesses with revenues of \$1MM or less was comparable to the demographic figure. In addition, all loans to businesses with revenues of \$1MM or less were in amounts of \$100M or less, which are amounts generally requested by smaller business entities.

Table 21

Distribution of 2020 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Casper MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	13	68.4	373	41.3	90.0
Over \$1 Million	2	10.5	267	29.6	9.3
Revenue Unknown	4	21.1	263	29.1	0.7
Total	19	100.0	903	100.0	100.0
By Loan Size					
\$100,000 or Less	17	89.5	449	49.7	
\$100,001 - \$250,000	2	10.5	454	50.3	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	19	100.0	903	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	13	100.0	373	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	13	100.0	373	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank's responsiveness to CD needs of its AA 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 AA. The bank's CD performance demonstrates adequate responsiveness. Table 22 outlines the bank's CD activities. All of the bank's CD loan originations were PPP loans.

Table 22

Community Development Activity									
Assessment Area: Casper MSA									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
	#	\$(000)	Investments		Donations		Total Investments		
			#	\$(000)	#	\$(000)	#	\$(000)	
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	6	6	6	6	5
Economic Development	48	3,541	0	0	0	0	0	0	0
Revitalization and Stabilization	1	586	0	0	0	0	0	0	0
Totals	49	4,127	0	0	6	6	6	6	5

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

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN CHEYENNE MSA AA

The Cheyenne MSA AA includes all of Laramie County, which is congruent with the Cheyenne, Wyoming MSA. Refer to Appendix B for a map of the AA, as well as Appendix D for additional demographic data.

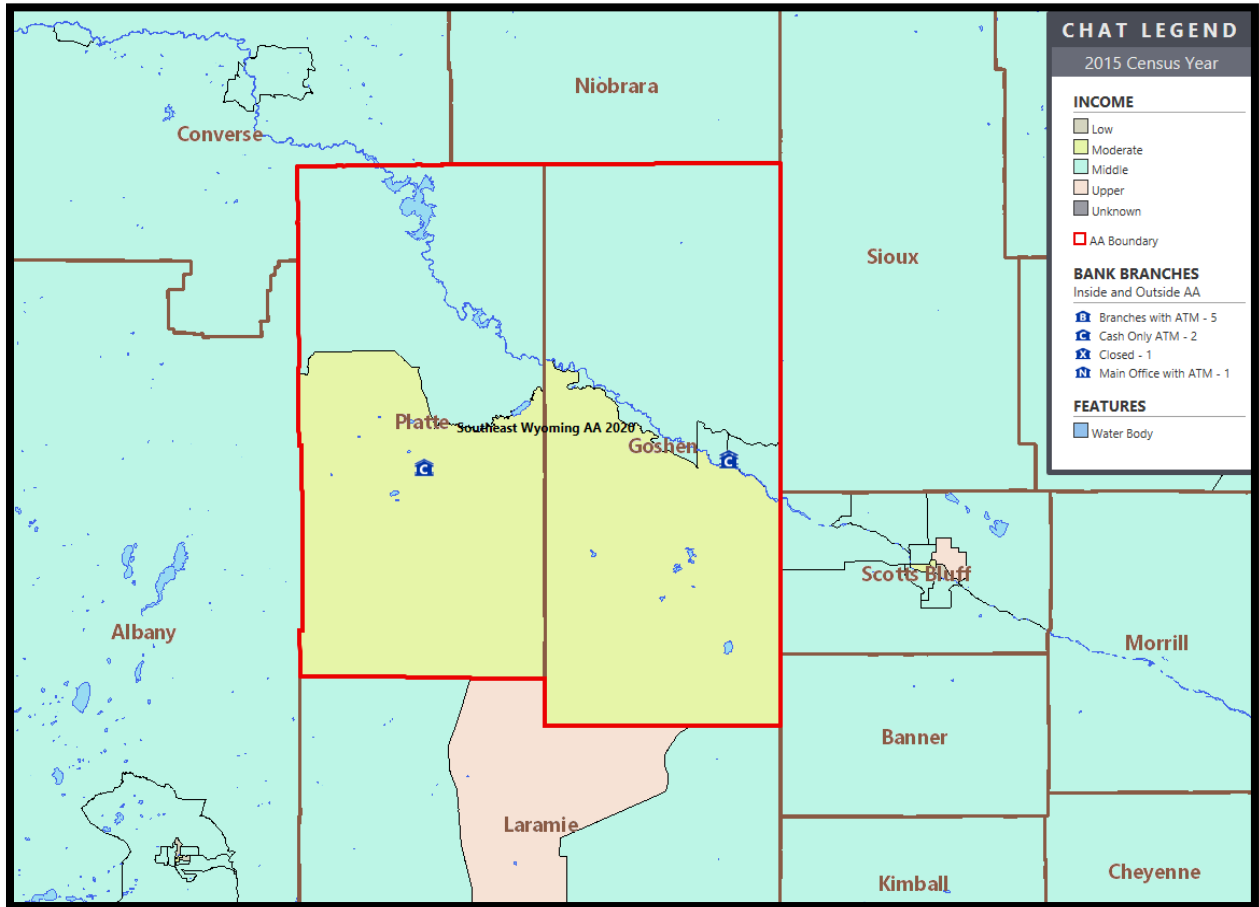
- The AA is comprised of 21 census tracts, including 6 moderate-, 10 middle-, 4 upper-, and 1 unknown-income census tracts. The bank's AA as well as the census tract income designations have not changed since the prior CRA evaluation.
- The bank operates two full-service branches in Cheyenne, Wyoming, with a full-service ATM at each location.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked 11th of 19 FDIC insured depository institutions in the AA with a market share of 3.5 percent.
- According to the 2015 ACS, the AA's population is 95,431.
- An interview with a member of the community within the bank's AA was conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact represented an organization focused on business development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHEYENNE MSA AA

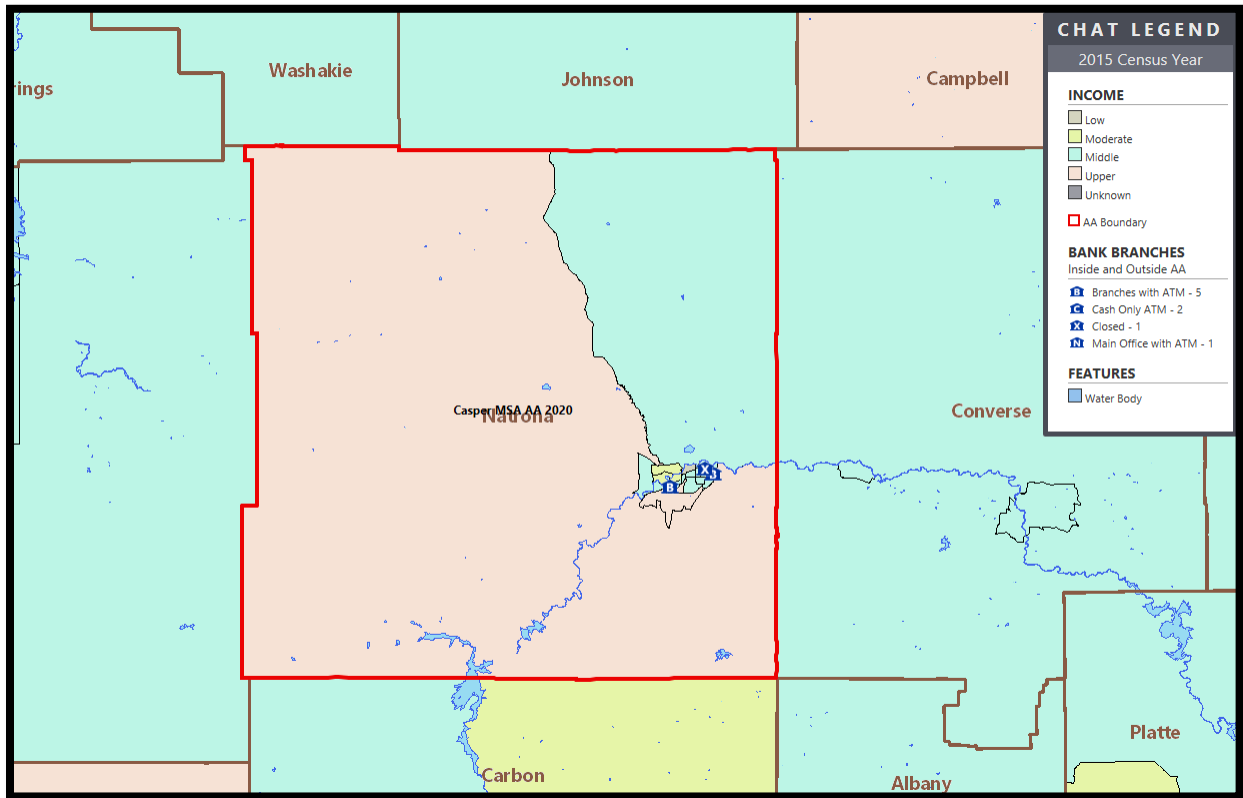
The institution's performance in the Cheyenne MSA AA was reviewed using the limited-scope examination procedures. The institution's lending and CD performance in the AA is consistent with the institution's performance overall. For the evaluation, the bank's lending activity in this AA included 76 loans from 2019 and 51 loans from 2020 as well as 29 small business loans in 2020. Additionally, the bank made 112 CD loans totaling \$3.3MM, 8 donations totaling \$31,000, and also provided 2 financial services to a local non-profit entity. Demographic and lending tables for this AA are included in Appendix C.

APPENDIX A – MAP OF THE ASSESMENT AREAS

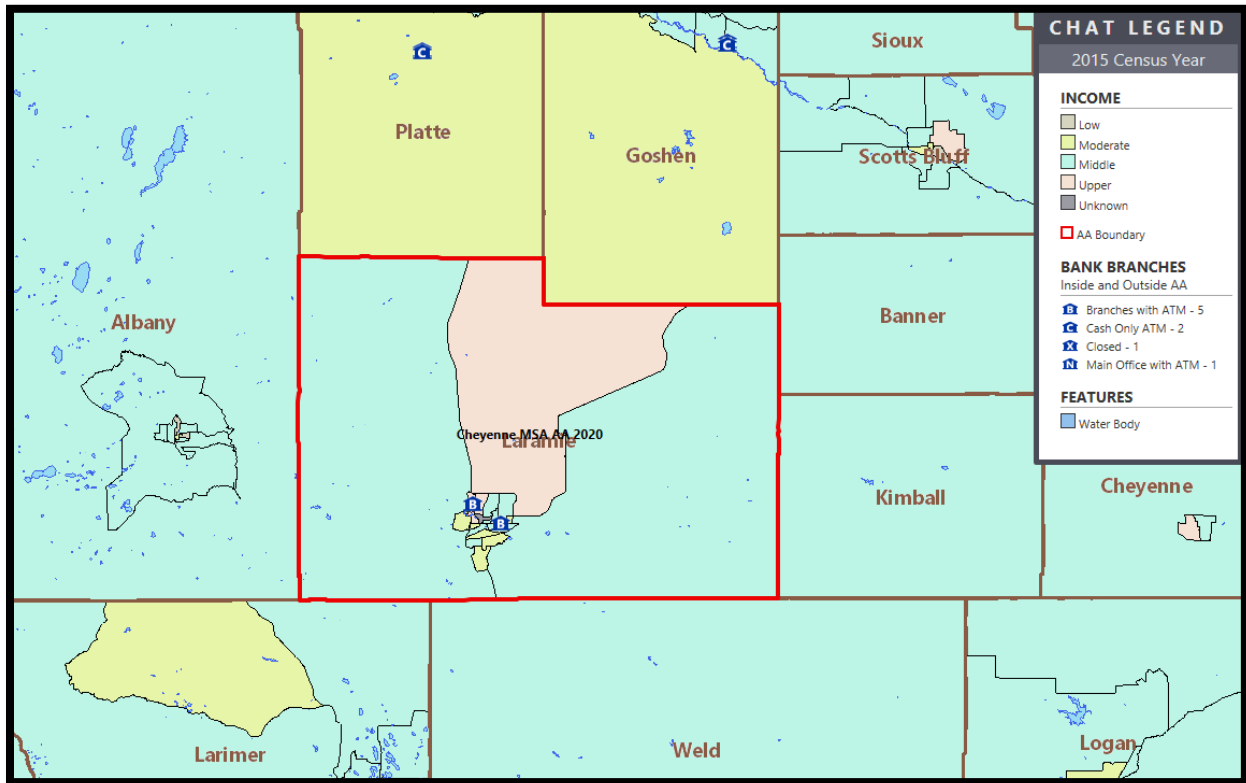
Southeast Wyoming AA



Casper MSA AA



Cheyenne MSA AA



**APPENDIX B – DEMOGRAPHIC INFORMATION
Table B-1**

2019 Casper MSA AA 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	775	18.7	660	17.8	106	25.4	9	28.1
Moderate	412	9.9	336	9.1	72	17.3	4	12.5
Middle	2,268	54.7	2,085	56.4	172	41.2	11	34.4
Upper	694	16.7	619	16.7	67	16.1	8	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,149	100.0	3,700	100.0	417	100.0	32	100.0
Percentage of Total Businesses:				89.2		10.1		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	5.5	4	4.4	1	100.0	0	0.0
Moderate	9	9.9	9	10.0	0	0.0	0	0.0
Middle	35	38.5	35	38.9	0	0.0	0	0.0
Upper	42	46.2	42	46.7	0	0.0	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
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Table B-2

2020 Casper MSA AA 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	834	19.2	718	18.3	107	26.4	9	28.1
Moderate	423	9.7	348	8.9	71	17.5	4	12.5
Middle	2,297	52.8	2,128	54.4	159	39.3	10	31.3
Upper	798	18.3	721	18.4	68	16.8	9	28.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,352	100.0	3,915	100.0	405	100.0	32	100.0
Percentage of Total Businesses:				90.0		9.3		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	4.7	3	3.6	1	100.0	0	0.0
Moderate	8	9.4	8	9.5	0	0.0	0	0.0
Middle	37	43.5	37	44.0	0	0.0	0	0.0
Upper	36	42.4	36	42.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	85	100.0	84	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

Table B-3

2019 Southeast 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	1,844	31.6
Moderate	2	33.3	2,456	42.1	335	13.6	1,053	18.1
Middle	4	66.7	3,377	57.9	463	13.7	1,072	18.4
Upper	0	0.0	0	0.0	0	0.0	1,864	32.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	5,833	100.0	798	13.7	5,833	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	4,674	3,052	43.5	65.3	910	19.5	712	15.2
Middle	5,969	3,965	56.5	66.4	1,215	20.4	789	13.2
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
Total AA	10,643	7,017	100.0	65.9	2,125	20.0	1,501	14.1
	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	439	46.7	402	47.1	23	37.7	14	53.8
Middle	501	53.3	451	52.9	38	62.3	12	46.2
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
Total AA	940	100.0	853	100.0	61	100.0	26	100.0
Percentage of Total Businesses:				90.7		6.5		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	127	66.5	125	66.5	2	100.0	0	0.0
Middle	64	33.5	63	33.5	0	0.0	1	100.0
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
Total AA	191	100.0	188	100.0	2	100.0	1	100.0
Percentage of Total Farms:				98.4		1.0		0.5
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table B-4

2020 Southeast 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	1,844	31.6
Moderate	2	33.3	2,456	42.1	335	13.6	1,053	18.1
Middle	4	66.7	3,377	57.9	463	13.7	1,072	18.4
Upper	0	0.0	0	0.0	0	0.0	1,864	32.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6	100.0	5,833	100.0	798	13.7	5,833	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	4,674	3,052	43.5	65.3	910	19.5	712	15.2
Middle	5,969	3,965	56.5	66.4	1,215	20.4	789	13.2
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
Total AA	10,643	7,017	100.0	65.9	2,125	20.0	1,501	14.1
	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	447	46.6	413	47.4	20	32.8	14	51.9
Middle	513	53.4	459	52.6	41	67.2	13	48.1
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
Total AA	960	100.0	872	100.0	61	100.0	27	100.0
Percentage of Total Businesses:				90.8		6.4		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	127	64.5	125	64.4	2	100.0	0	0.0
Middle	70	35.5	69	35.6	0	0.0	1	100.0
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
Total AA	197	100.0	194	100.0	2	100.0	1	100.0
Percentage of Total Farms:				98.5		1.0		0.5
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

**APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES
Table C-1**

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: Cheyenne MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	11.1	20.7	319	7.5	16.1	1	4.0	19.1	401	5.8	13.7	22.8
Middle	12	66.7	56.6	3,070	72.6	57.3	15	60.0	59.0	3,471	50.2	59.9	50.7
Upper	4	22.2	22.7	841	19.9	26.6	9	36.0	21.9	3,042	44.0	26.4	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	18	100.0	100.0	4,230	100.0	100.0	25	100.0	100.0	6,914	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	23.8	15.2	767	18.4	12.4	4	9.1	13.0	763	6.3	10.6	22.8
Middle	11	52.4	58.7	2,525	60.7	57.8	29	65.9	55.5	8,089	66.5	54.5	50.7
Upper	5	23.8	26.0	867	20.8	29.8	11	25.0	31.6	3,321	27.3	34.9	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	21	100.0	100.0	4,159	100.0	100.0	44	100.0	100.0	12,173	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.8	0	0.0	15.7	0	0.0	11.8	0	0.0	10.9	22.8
Middle	0	0.0	51.6	0	0.0	44.8	0	0.0	48.7	0	0.0	55.5	50.7
Upper	0	0.0	33.5	0	0.0	39.5	0	0.0	39.5	0	0.0	33.5	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.7	0	0.0	3.6	3	75.0	50.0	1,358	51.6	80.4	26.7
Middle	0	0.0	58.3	0	0.0	79.1	1	25.0	36.4	1,275	48.4	11.0	57.2
Upper	0	0.0	25.0	0	0.0	17.3	0	0.0	13.6	0	0.0	8.7	16.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	2,633	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	11	21.6	18.3	1,499	14.8	14.5	8	10.5	15.6	2,522	11.6	14.0	22.8
Middle	29	56.9	57.4	6,774	66.8	57.8	48	63.2	56.6	12,858	59.1	55.3	50.7
Upper	11	21.6	24.4	1,868	18.4	27.7	20	26.3	27.8	6,363	29.3	30.7	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	51	100.0	100.0	10,141	100.0	100.0	76	100.0	100.0	21,743	100.0	100.0	100.0

Source: 2020 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table C-2

Distribution of 2020 Small Business Lending By Income Level of Geography					
Assessment Area: Cheyenne MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	2	6.9	58	4.5	15.9
Middle	14	48.3	427	33.2	67.0
Upper	13	44.8	800	62.3	16.8
Unknown	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	0	0.0	
Total	29	100.0	1,285	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table C-3

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Cheyenne MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	5.6	5.2	182	4.3	2.8	1	4.0	5.5	135	2.0	2.9	19.5
Moderate	5	27.8	22.6	972	23.0	16.5	2	8.0	23.5	263	3.8	17.5	18.2
Middle	3	16.7	26.0	598	14.7	25.5	6	24.0	25.5	1,557	22.4	25.3	23.1
Upper	9	50.0	29.5	2,478	58.6	37.2	11	44.0	28.7	3,916	56.6	36.7	39.3
Unknown	0	0.0	16.8	0	0.0	18.1	5	20.0	16.7	1,049	15.2	17.6	0.0
Total	18	100.0	100.0	4,230	100.0	100.0	25	100.0	100.0	6,914	100.0	100.0	100.0
Refinance Loans													
Low	1	4.8	6.1	9	0.2	3.2	0	0.0	3.6	0	0.0	2.0	19.5
Moderate	2	9.5	13.7	29	0.7	10.2	2	4.5	11.7	346	2.8	8.5	18.2
Middle	3	14.3	20.8	959	23.1	18.5	8	18.2	17.0	2,432	20.0	15.2	23.1
Upper	11	52.4	30.6	2,543	61.7	34.9	24	54.5	32.3	7,044	57.9	35.7	39.3
Unknown	4	19.0	28.8	619	14.9	33.2	10	22.7	35.3	2,351	19.3	38.7	0.0
Total	21	100.0	100.0	4,159	100.0	100.0	44	100.0	100.0	12,173	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.5	0	0.0	3.2	0	0.0	3.3	0	0.0	2.1	19.5
Moderate	0	0.0	15.5	0	0.0	13.0	0	0.0	11.8	0	0.0	6.2	18.2
Middle	0	0.0	28.4	0	0.0	27.9	0	0.0	27.0	0	0.0	21.9	23.1
Upper	0	0.0	47.7	0	0.0	48.8	0	0.0	52.0	0	0.0	54.7	39.3
Unknown	0	0.0	3.9	0	0.0	7.1	0	0.0	5.9	0	0.0	15.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	3.9	5.5	191	1.9	3.0	1	1.4	4.4	135	0.7	2.3	19.5
Moderate	9	17.6	18.8	1,013	10.0	14.0	5	6.9	16.2	614	3.2	12.1	18.2
Middle	7	13.7	24.0	1,567	15.5	22.7	14	19.4	20.2	3,983	20.8	19.2	23.1
Upper	20	39.2	30.6	5,021	49.5	36.2	37	51.4	31.2	10,978	57.4	36.0	39.3
Unknown	13	25.5	21.1	2,349	23.2	24.2	15	20.8	28.0	3,400	17.8	30.4	0.0
Total	51	100.0	100.0	10,141	100.0	100.0	72	100.0	100.0	19,110	100.0	100.0	100.0
<p>Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p> <p>Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

Table C-4

Distribution of 2020 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Cheyenne MS					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	21	72.4	606	47.2	91.0
Over \$1 Million	4	13.8	595	46.3	6.6
Revenue Unknown	4	13.8	84	6.5	2.4
Total	29	100.0	1,285	100.0	100.0
By Loan Size					
\$100,000 or Less	26	89.7	629	48.9	
\$100,001 - \$250,000	2	6.9	256	19.9	
\$250,001 - \$1 Million	1	3.4	400	31.1	
Total	29	100.0	1,285	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	20	95.2	495	81.7	
\$100,001 - \$250,000	1	4.8	111	18.3	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	21	100.0	606	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Table C-5

2019 Cheyenne MSA 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	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	875	16.3	788	16.1	67	18.3	20	15.4
Middle	3,553	66.1	3,214	65.8	252	68.9	87	66.9
Upper	931	17.3	862	17.7	46	12.6	23	17.7
Unknown	20	0.4	19	0.4	1	0.3	0	0.0
Total AA	5,379	100.0	4,883	100.0	366	100.0	130	100.0
Percentage of Total Businesses:				90.8		6.8		2.4
	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	9	5.1	9	5.2	0	0.0	0	0.0
Middle	137	78.3	134	77.9	3	100.0	0	0.0
Upper	29	16.6	29	16.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	175	100.0	172	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table C-6

2020 Cheyenne MSA 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	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	896	15.9	815	15.9	64	17.3	17	12.4
Middle	3,767	67.0	3,411	66.7	260	70.1	96	70.1
Upper	944	16.8	876	17.1	45	12.1	23	16.8
Unknown	17	0.3	14	0.3	2	0.5	1	0.7
Total AA	5,624	100.0	5,116	100.0	371	100.0	137	100.0
Percentage of Total Businesses:				91.0		6.6		2.4
	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	7	4.0	7	4.0	0	0.0	0	0.0
Middle	137	77.4	135	77.1	2	100.0	0	0.0
Upper	33	18.6	33	18.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	177	100.0	175	100.0	2	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0
Source: 2020 FFIEC Census Data								
2020 Dun & Bradstreet Data								
2011-2015 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.