



## **PUBLIC DISCLOSURE**

March 18, 2024

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

Jonah Bank of Wyoming  
RSSD# 3412417

777 West First Street  
Casper, Wyoming 82601

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

**NOTE:**

This document is an evaluation of this 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**

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

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

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside its two delineated 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 CD needs of its 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 two AAs, the Cheyenne MSA AA and the Casper MSA AA, using a full-scope review. Examiners reviewed the following data:

- The bank's 16-quarter average NLTD ratio;
- The universe of 1,927 home mortgage loans reported on the bank's 2021 and 2022 HMDA Loan/Application Registers (LARs);
- A statistical sample of 74 small business loans from a universe of 116 outstanding loans originated between January 1, 2022, and December 31, 2022; and,
- CD loans, qualified investments, and CD services from February 4, 2020 through December 31, 2023.

For this evaluation, more weight was placed on the bank's mortgage lending based on the higher number of originations when compared to the universe of small business loans. While conclusions with respect to home mortgage lending performance were evaluated for two years, only 2022 lending tables are reflected in the body of the report, with comparisons made to 2021 lending data located in Appendix C of this report.

Aggregate lending data for 2021 and 2022 was referenced for additional perspective to gauge home mortgage demand within the bank's AAs for the bank's HMDA lending performance. For the evaluation of small business lending, available CRA aggregate data for the most recent three years (2020, 2021, and 2022) was averaged and referenced for additional performance context.

Overall, additional emphasis was placed on the bank's performance in comparison to available aggregate lending data rather than comparisons to relative demographic figures, particularly for the bank's HMDA lending, as aggregate lending data is considered representative of credit demand within a defined geographic area. Greater consideration was also given to the volume of loan originations rather than the dollar amount, as volume is more representative of the number of individuals and entities served. Lastly, the Cheyenne MSA AA received more weight than the Casper MSA AA based on higher number of loan originations in the Cheyenne MSA AA.

## **DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of Jonah Bankshares, a one-bank holding company.
- The bank has total assets of \$514.0 million as of September 30, 2023.
- In addition to the main office and one branch location in Casper, the bank operates two additional offices in Cheyenne, Wyoming.
- The bank maintains a full-service automated teller machine (ATM) at each of its three branch locations, although the main office in Casper does not currently offer ATM services.
- As shown in the table below, the bank's primary business focus is commercial and residential real estate lending. Commercial loans comprise the largest portion of the loan portfolio by dollar volume, although the bank originates a substantial number of residential home mortgage loans that are sold on the secondary market and are not reflected in the loan portfolio composition.
- The bank has a significant mortgage brokering relationship with a third-party originator (TPO) located in Laramie, Wyoming. The bank provides the credit decision on applications received from the TPO and table-funds TPO-originated conventional and Federal Housing Administration mortgage loans until the loans are sold through the secondary mortgage market.

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	24,862	7.5
Farmland	19,166	5.8
1- to 4-Family Residential Real Estate	52,534	15.8
Multifamily Residential Real Estate	19,598	5.9
Nonfarm Nonresidential Real Estate	164,129	49.3
Agricultural	754	0.2
Commercial and Industrial	49,129	14.8
Consumer	1,810	0.5
Other	703	0.2
<b>Gross Loans</b>	<b>332,685</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its February 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>**

**LENDING TEST**

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the Casper MSA and Cheyenne MSA AAs. The bank’s overall lending test performance is Satisfactory. The bank’s performance in the Casper MSA and Cheyenne MSA AAs was considered reasonable.

**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 FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and the area where they are located. The bank’s NLTD ratio is reasonable and fell within the performance of the four similarly situated institutions with NLTD ratios ranging from 39.3 percent to 91.2 percent.

<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 assessment areas.

**Table 2**

Comparative NLTD Ratios December 31, 2019 – September 30, 2023			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			16 Quarter Average
Jonah Bank of Wyoming	Casper, Wyoming	514,019	68.9
<b>Similarly Situated Institutions</b>			
Wyoming Bank and Trust	Cheyenne, Wyoming	323,616	47.5
Platte Valley Bank	Torrington, Wyoming	683,368	91.2
AMG National Trust Bank	Boulder, Colorado	600,597	39.3
Riverstone Bank	Eagle, Nebraska	497,668	88.4

**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 volume, inside the AAs.

**Table 3**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Purchase – Conventional	544	59.3	135,978	57.5	373	40.7	100,154	42.4
Home Purchase – FHA	107	69.9	27,191	69.9	46	30.1	11,713	30.1
Home Purchase – VA	129	75.0	47,646	74.7	43	25.0	16,179	25.3
Home Improvement	9	90.0	988	94.3	1	10.0	60	5.7
Multi-Family Housing	6	85.7	2,127	39.7	1	14.3	3,230	60.3
Other Purpose Closed-End	3	60.0	370	37.9	2	40.0	605	62.1
Refinancing	390	58.8	95,464	59.5	273	41.2	64,846	40.5
<b>Total HMDA Related</b>	<b>1,188</b>	<b>61.7</b>	<b>309,764</b>	<b>61.2</b>	<b>739</b>	<b>38.3</b>	<b>196,787</b>	<b>38.8</b>
Small Business	67	90.5	16,914	94.1	7	9.5	1,053	5.9
<b>Total Loans</b>	<b>1,255</b>	<b>62.7</b>	<b>326,678</b>	<b>62.3</b>	<b>746</b>	<b>37.3</b>	<b>197,840</b>	<b>37.7</b>

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

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank’s AAs.

**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 Casper MSA and Cheyenne MSA AAs.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes in both 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 test performance is satisfactory and demonstrates adequate responsiveness in the Casper MSA and Cheyenne MSA AAs.

**Table 4**

Community Development Activity – All									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	3	174	4	20	7	194	15
Community Services	0	0	0	0	51	374	51	374	30
Economic Development	6	1,703	0	0	0	0	0	0	12
Revitalization and Stabilization	144	17,774	0	0	3	14	3	14	0
Outside Activities	0	0	0	0	0	0	0	0	0
<b>Totals</b>	<b>150</b>	<b>19,477</b>	<b>3</b>	<b>174</b>	<b>58</b>	<b>408</b>	<b>61</b>	<b>582</b>	<b>57</b>

**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.

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

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

The bank's delineated AA is comprised of Natrona County in its entirety, which represents the Casper, Wyoming MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The 2022 AA comprises 20 census tracts, including 5 moderate-, 9 middle-, and 6 upper-income census tracts based on the most recent 2016-2020 American Community Survey (ACS) data.
- The 2021 remains unchanged from the 2022 delineation, although it was comprised of 18 census tracts, including 1 low-, 3 moderate-, 11 middle-, and 3 upper-income census tract(s) based on 2011-2015 ACS data.
- The bank's presence in the AA includes two full-service offices in Casper, including the home office located in a moderate-income census tract and a branch location in a middle-income census tract. Both offices provide drive-thru services, and the branch maintains a full-service ATM.
- According to the June 30, 2023 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, the bank ranked 4<sup>th</sup> of 9 FDIC-insured depository institutions operating from 19 locations in the AA, with a total deposit market share of 9.1 percent.
- To further augment the CRA performance evaluation, an interview with a member of the community from a recently conducted CRA evaluation of another financial institution with offices in the bank's AA was referenced to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and perspectives on local economic and demographic characteristics. The community member represents a local economic development organization.

**Table 5**

<b>Population Change Assessment Area: Casper MSA</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Casper MSA	80,011	79,955	(0.1)
Wyoming	579,679	576,851	(0.5)
<i>Source: 2020 U.S. Census Bureau: Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- Natrona County is the second most populous county in Wyoming with 13.8 percent of the total residents of the entire state.



- A majority of the AA population (73.8 percent) is concentrated in the city of Casper.
- Casper is also the second most populated city in the state and serves as the county seat of Natrona County.

**Table 6**

<b>Median Family Income Change</b>			
<b>Assessment Area: Casper MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Casper MSA	78,017	78,926	1.2
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.*

- Median family income (MFI) in the AA reflected positive growth from 2015 to 2020, although it was slightly below the state of Wyoming statistic.
- Based on 2020 ACS data, the portion of AA families living below the poverty level, at 6.4 percent, was also slightly below the state of Wyoming figure of 6.7 percent.

**Table 7**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Casper MSA</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>
Casper MSA	72.2	24.8	38.1	54.8	36.0	17.9
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 housing affordability ratio<sup>2</sup> of 28.6 percent in the AA was identical to the state of Wyoming figure, denoting affordable housing across both areas.
- The housing cost burden for moderate-income renters in the AA and state of Wyoming was a fraction of the respective figures for low-income renters, while the cost burden for home ownership was more favorable for low-income owners and all owners when compared to respective statistics for renters.
- The median housing value in the AA of \$215,397 was slightly below the Wyoming figure of \$228,000.
- A community member noted limited housing stock and a lack of affordable housing in the area after the onset of the Coronavirus Disease 2019 Pandemic

<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.

(pandemic), when the ability to work from home created an influx of migration to the Casper area by those seeking to utilize the various outdoor amenities available throughout the surrounding Laramie Mountain Range.

**Table 8**

<b>Unemployment Rates</b>					
<b>Assessment Area: Casper MSA</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Casper MSA	4.6	4.0	7.9	6.2	4.0
Wyoming	4.1	3.7	5.9	4.6	3.6

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

- The 2022 unemployment figures in the AA and state of Wyoming have trended downward and are consistent with levels noted in 2019, immediately prior to the onset of the pandemic in early 2020.
- The largest employment sectors in the AA include health care and social assistance (6,544 employees), retail trade (4,720), and accommodation and food services (3,587).

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CASPER MSA AA**

**LENDING TEST**

The bank’s performance in the Casper MSA AA is reasonable. Overall, the bank’s geographic distribution and borrower distribution of loans among individuals of different income levels and business of different sizes is reasonable. The evaluation included a review of 399 home mortgage loans originated between January 1, 2021 and December 31, 2022 and 43 small business loans originated between January 1, 2022 and December 31, 2022. As previously noted, more weight was attributed to home mortgage lending based on a higher number of loans originated during the evaluation period.

The home mortgage lending evaluation for this AA included a review of home purchase, refinance, and total home mortgage lending. Home improvement and multifamily loans were not evaluated at the individual product level based on lending volumes too low to conduct meaningful analyses.

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage lending was reasonable, while performance for small business lending was poor.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of 2022 home mortgage loans among moderate-income census tracts was comparable to aggregate lending data by number and dollar volume, as well as the demographic figure.

The geographic distribution of home mortgage loans in 2021 reflected penetration levels consistent with 2022 lending patterns. Furthermore, an evaluation of the dispersion of home mortgage loans did not identify any conspicuous gaps or lapses within the AA.

### Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The distribution of 2022 home purchase loans among the AA's moderate-income census tracts was below the aggregate lending data by number and dollar volume, and below the demographic figure.

The geographic distribution of home purchase lending in 2021 exceeded performance in 2022 and contributed to the overall rating based on higher lending volume in 2021.

### Home Refinance Lending

The geographic distribution of home refinance lending is excellent. The distribution of 2022 home refinance loans among the AA's moderate-income census tracts was comparable to aggregate lending data by number and dollar volume, and to the demographic figure.

The geographic distribution of home purchase lending in 2021 exceeded performance in 2022 and contributed to the overall rating based on higher lending volume in 2021.

**Table 9**

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Casper MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	17	13.2	21.6	3,806	11.7	17.7	22.4
Middle	79	61.2	52.0	18,168	56.0	48.2	49.0
Upper	33	25.6	26.4	10,445	32.2	34.1	28.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>32,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	15.4	16.3	667	9.2	12.4	22.4
Middle	12	46.2	53.9	2,770	38.0	51.3	49.0
Upper	10	38.5	29.7	3,850	52.8	36.3	28.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>7,287</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	100.0	19.0	457	100.0	17.9	22.4
Middle	0	0.0	47.4	0	0.0	52.7	49.0
Upper	0	0.0	33.6	0	0.0	29.4	28.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	53.8	427	100.0	33.9	20.4
Middle	0	0.0	23.1	0	0.0	48.8	56.1
Upper	0	0.0	23.1	0	0.0	17.2	23.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>427</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	24	15.2	20.4	5,357	13.2	16.9	22.4
Middle	91	57.6	51.7	20,938	51.6	48.7	49.0
Upper	43	27.2	27.9	14,295	35.2	34.3	28.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>158</b>	<b>100.0</b>	<b>100.0</b>	<b>40,590</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is poor. The distribution of 2022 small business loans among moderate-income census tracts was below the demographic figure. A review of the dispersion of loans among the various tracts throughout the AA revealed no conspicuous gaps or lapses.

**Table 10**

Distribution of 2022 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	0.0
Moderate	9	20.9	2,942	34.6	31.8
Middle	21	48.8	3,431	40.3	38.8
Upper	13	30.2	2,143	25.2	29.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>43</b>	<b>100.0</b>	<b>8,515</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 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 Borrowers of Different Income Levels and to Businesses of Different Sizes**

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of home mortgage and small business lending was reasonable.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2022 home mortgage lending to low-income borrowers was comparable to aggregate lending data by number and dollar volume, and below the demographic figure. The distribution among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume, and above the demographic figure.

The borrower distribution of 2021 home mortgage loans reflected consistent performance with 2022 lending patterns.

### Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The distribution of 2022 home purchase loans among low-income borrowers was comparable to aggregate lending data by number and dollar volume, but below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number and dollar volume and above to the demographic figure.

The borrower distribution of 2021 home purchase loans was consistent with 2022 lending patterns.

### Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The bank did not originate any home refinance loans to low-income borrowers in 2022. The distribution of lending among moderate-income borrowers was above aggregate lending data by number, comparable by dollar volume, and above the demographic figure.

The borrower distribution of 2021 home refinance loans was consistent with 2022 lending patterns.

**Table 11**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Casper MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	10	7.8	8.5	1,513	4.7	4.3	19.2
Moderate	31	24.0	21.1	5,182	16.0	14.1	19.1
Middle	26	20.2	19.1	7,363	22.7	18.3	22.0
Upper	55	42.6	23.1	17,175	53.0	31.1	39.7
Unknown	7	5.4	28.2	1,186	3.7	32.3	0.0
<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>32,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	9.9	0	0.0	6.2	19.2
Moderate	7	26.9	21.3	1,095	15.0	16.6	19.1
Middle	5	19.2	24.2	1,059	14.5	22.1	22.0
Upper	13	50.0	24.7	4,909	67.4	32.9	39.7
Unknown	1	3.8	19.8	224	3.1	22.2	0.0
<b>Total</b>	<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>7,287</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.4	0	0.0	4.0	19.2
Moderate	0	0.0	19.0	0	0.0	14.7	19.1
Middle	0	0.0	26.7	0	0.0	20.3	22.0
Upper	0	0.0	48.3	0	0.0	54.7	39.7
Unknown	2	100.0	2.6	457	100.0	6.4	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	10	6.4	8.4	1,513	3.8	4.6	19.2
Moderate	38	24.2	20.9	6,277	15.6	14.5	19.1
Middle	31	19.7	20.8	8,422	21.0	19.1	22.0
Upper	68	43.3	25.0	22,084	55.0	32.0	39.7
Unknown	10	6.4	24.9	1,867	4.6	29.8	0.0
<b>Total</b>	<b>157</b>	<b>100.0</b>	<b>100.0</b>	<b>40,163</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data							
2016-2020 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.							

**Small Business Lending**

The borrower distribution of small business lending is reasonable. The distribution of loans originated in 2022 to businesses with annual revenues of \$1MM or less (small businesses) reflected penetration levels below the demographic figure. However, to augment the analysis, a review of the three-year average aggregate lending data for small business lending noted a distribution of 50.4 percent of business loans in the AA by number were originated to small businesses, which was well-below the demographic figure. While not a direct comparator, as

the bank is not a CRA reporter, aggregate CRA figures are relevant as a proxy to ascertain demand for credit. The aggregate data reflects limited credit demand for small business loans and supports the bank’s reasonable rating.

**Table 12**

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Casper MSA</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>	24	55.8	4,776	56.1	90.3
<b>Over \$1 Million</b>	19	44.2	3,739	43.9	8.5
<b>Revenue Unknown</b>	0	0.0	0	0.0	1.2
<b>Total</b>	43	100.0	8,515	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	22	51.2	1,059	12.4	
<b>\$100,001 - \$250,000</b>	10	23.3	1,734	20.4	
<b>\$250,001 - \$1 Million</b>	11	25.6	5,722	67.2	
<b>Total</b>	43	100.0	8,515	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	9	37.5	395	8.3	
<b>\$100,001 - \$250,000</b>	8	33.3	1,234	25.8	
<b>\$250,001 - \$1 Million</b>	7	29.2	3,147	65.9	
<b>Total</b>	24	100.0	4,776	100.0	
<i>Source: 2022 FFIEC Census Data 2022 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>					

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance demonstrates adequate responsiveness to the CD needs in the AA. The overwhelming majority of CD activities by number and dollar volume was focused on loans originated to area businesses and farms through the United States Small Business Administration’s Paycheck Protection Program (PPP loans) in response to the pandemic. These loans served to help revitalize and stabilize LMI census tracts within the bank’s AA.



**Table 13**

<b>Community Development Activity Assessment Area: Casper MSA</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	0	0	0	0	2	10	2	10	0
<b>Community Services</b>	0	0	0	0	21	190	21	190	21
<b>Economic Development</b>	5	1,403	0	0	0	0	0	0	0
<b>Revitalization and Stabilization</b>	103	10,925	0	0	3	14	3	14	0
<b>Totals</b>	<b>108</b>	<b>12,328</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>214</b>	<b>26</b>	<b>214</b>	<b>21</b>

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

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE CHEYENNE MSA AA**

The bank's AA is comprised of Laramie County in its entirety, which represents the Cheyenne, Wyoming MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The bank's delineated AA remains unchanged since the prior evaluation. The 2022 AA is comprised of 27 census tracts, including 6 moderate-, 14 middle-, 6 upper-, and 1 unknown-income census tract(s) based on the most recent 2016-2020 American Community Survey (ACS) data.
- The 2021 remains unchanged from the 2022 delineation, although it was previously subdivided into 21 census tracts, including 6 moderate-, 10 middle-, 4 upper-, and 1 unknown-income census tract(s) based on 2011-2015 ACS data.
- The bank's presence in the AA includes two full-service offices in Cheyenne, including a branch location in a moderate-income census tract and a branch operating in a middle-income census tract. Both offices offer drive-thru facilities and maintain full-service ATMs.
- According to the June 30, 2023 FDIC Summary of Deposits Market Share Report, the bank ranked 6<sup>th</sup> of 19 FDIC-insured depository institutions operating from 32 locations in the AA, with a total deposit market share of 7.5 percent.
- An interview with a member of the community from a recently conducted CRA evaluation of another financial institution with offices in the bank's AA was reviewed for meaningful performance context related to perspectives on area economic conditions and area credit needs. The community member represents a local economic development organization.

**Table 14**

Population Change Assessment Area: Cheyenne MSA			
Area	2015 Population	2020 Population	Percent Change
Cheyenne MSA	95,431	100,512	5.3
Wyoming	579,679	576,851	(0.5)
<i>Source: 2020 U.S. Census Bureau: Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- Laramie County is the most densely populated among Wyoming's 23 counties, representing 17.4 percent of the residents in the state.

- A majority of AA residents (64.8 percent) are concentrated in the state capital of Cheyenne, which is the largest city in Wyoming and also serves as the county seat.

**Table 15**

<b>Median Family Income Change</b>			
<b>Assessment Area: Cheyenne MSA</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Cheyenne MSA	82,743	82,325	(0.5)
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.*

- MFI growth in the AA fell below statistics for the state of Wyoming in 2020, although the AA’s MFI figure remained slightly higher.
- Based on 2020 ACS data, the portion of AA families living below the poverty level, at 5.8 percent, was slightly below the Wyoming figure of 6.7 percent.

**Table 16**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Cheyenne MSA</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>
Cheyenne MSA	69.4	29.9	39.0	61.7	27.8	18.5
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*

- Various AA housing statistics were similar to those in the state of Wyoming, with affordability ratios nearly identical, at 28.7 percent and 28.6 percent respectively.
- A community member noted a critical shortage of affordable housing in the area.

**Table 17**

<b>Unemployment Rates</b>					
<b>Assessment Area: Cheyenne MSA</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Cheyenne MSA	3.9	3.5	5.2	4.2	3.5
Wyoming	4.1	3.7	5.9	4.6	3.6

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

- Unemployment rates in the AA and state of Wyoming have trended back to pre-pandemic levels in 2022, although rates at the initial onset of the pandemic during 2020 were considerably lower than the national average of 8.1 percent.
- The largest employment sectors in the AA include retail trade (7,476 employees), health care and social assistance (7,037), and public administration (5,178).

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHEYENNE MSA AA**

The bank's performance in the Cheyenne MSA AA is reasonable. Overall, the bank's geographic distribution and borrower distribution of loans among individuals of different income levels and business of different sizes is reasonable. The evaluation included a review of 789 home mortgage loans originated between January 1, 2021 and December 31, 2022 and 24 small business loans originated between January 1, 2022 and December 31, 2022.

Consistent with the Casper MSA AA review, home improvement and multifamily loans in this AA were not evaluated at the individual product level based on lending volumes too low to render meaningful analyses.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage and small business lending was reasonable.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of 2022 home mortgage loans among moderate-income census tracts was comparable to aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The geographic distribution of home mortgage loans in 2021 reflected penetration levels consistent with 2022 lending patterns. A review of the dispersion of loans among the various tracts throughout the AA revealed no conspicuous gaps or lapses.

#### Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The distribution of 2022 home mortgage loans among moderate-income census tracts was below the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure.

The geographic distribution of home mortgage loans in 2021 reflected penetration levels that exceeded performance in 2022 and supported the overall rating based on higher lending volume in 2021.

Home Refinance Lending

The geographic distribution of home refinance lending is reasonable. The distribution of 2022 home refinance loans among moderate-income census tracts was above the aggregate lending data by number and dollar volume, and above the demographic figure.

The geographic distribution of home mortgage loans in 2021 reflected penetration levels below the 2022 distribution and supported the overall rating based on higher lending volume in 2021.

**Table 18**

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Cheyenne MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	16	8.7	13.5	3,825	6.7	9.5	11.3
Middle	104	56.5	57.1	30,218	53.2	54.9	57.1
Upper	64	34.8	29.3	22,715	40.0	35.6	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>184</b>	<b>100.0</b>	<b>100.0</b>	<b>56,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	21.7	9.8	1,714	16.4	7.4	11.3
Middle	21	45.7	59.6	4,703	45.0	56.3	57.1
Upper	15	32.6	30.6	4,036	38.6	36.3	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>10,453</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	20.0	11.6	16	5.4	9.6	11.3
Middle	4	80.0	59.7	279	94.6	54.1	57.1
Upper	0	0.0	28.7	0	0.0	36.3	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>295</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	50.0	35.7	654	46.1	42.6	27.4
Middle	2	50.0	57.1	765	53.9	44.7	59.5
Upper	0	0.0	7.1	0	0.0	12.7	13.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	29	12.1	11.8	6,209	9.0	9.8	11.3
Middle	132	55.0	58.3	36,005	52.2	54.9	57.1
Upper	79	32.9	29.9	26,751	38.8	35.2	31.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>240</b>	<b>100.0</b>	<b>100.0</b>	<b>68,965</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data 2016-2020 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 reasonable. The distribution of 2022 small business loans among moderate-income census tracts was comparable to the demographic figure.

An analysis of loan dispersion revealed gaps and lapses that did not include the AA’s moderate-income census tracts and were primarily the result of a relatively small number of loans dispersed among the AA’s 27 census tracts. Based on this factor, the dispersion of small business lending in the AA had no impact on the overall rating.

**Table 19**

<b>Distribution of 2022 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Cheyenne MSA</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	0.0
<b>Moderate</b>	10	41.7	4,251	50.6	47.7
<b>Middle</b>	7	29.2	2,505	29.8	34.2
<b>Upper</b>	7	29.2	1,643	19.6	17.8
<b>Unknown</b>	0	0.0	0	0.0	0.3
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	24	100.0	8,399	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 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 Borrowers of Different Income Levels and to Businesses of Different Sizes**

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of home mortgage and small business lending was reasonable for both products.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2022 home mortgage lending to low-income borrowers was comparable to aggregate lending data by number and dollar volume, but below the demographic figure. The distribution among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume, and above the demographic figure.

The borrower distribution of 2021 home mortgage loans reflected consistent performance with 2022 lending patterns.

#### Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The distribution of 2022 home purchase loans among low-income borrowers was comparable to aggregate lending data by number and dollar volume, but below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number and dollar volume and above the demographic figure.

The borrower distribution of 2021 home purchase loans was consistent with 2022 lending performance.

#### Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The distribution of 2022 home refinance loans among low-income borrowers was comparable to aggregate lending data by number and dollar volume, and below the demographic figure. The distribution of lending among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume, and to the demographic figure.

The borrower distribution of 2021 home refinance loans was consistent with 2022 lending patterns.



**Table 20**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Cheyenne MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	16	8.7	6.5	3,165	5.6	3.6	17.3
Moderate	54	29.3	23.7	14,441	25.4	17.9	17.9
Middle	37	20.1	23.4	10,915	19.2	23.0	25.0
Upper	66	35.9	25.7	25,303	44.6	33.0	39.7
Unknown	11	6.0	20.7	2,934	5.2	22.5	0.0
<b>Total</b>	<b>184</b>	<b>100.0</b>	<b>100.0</b>	<b>56,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	5	10.9	11.9	940	9.0	7.5	17.3
Moderate	11	23.9	23.6	2,280	21.8	20.0	17.9
Middle	11	23.9	24.1	3,203	30.6	23.4	25.0
Upper	8	17.4	23.9	2,111	20.2	30.2	39.7
Unknown	11	23.9	16.6	1,919	18.4	19.0	0.0
<b>Total</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>10,453</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	20.0	6.9	25	8.5	4.3	17.3
Moderate	1	20.0	22.2	81	27.5	15.4	17.9
Middle	2	40.0	28.2	31	10.5	26.8	25.0
Upper	1	20.0	39.4	158	53.6	48.9	39.7
Unknown	0	0.0	3.2	0	0.0	4.6	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>295</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	22	9.3	8.2	4,130	6.1	4.7	17.3
Moderate	67	28.4	23.2	16,842	24.9	18.3	17.9
Middle	50	21.2	24.3	14,149	20.9	23.2	25.0
Upper	75	31.8	26.7	27,572	40.8	32.8	39.7
Unknown	22	9.3	17.6	4,853	7.2	21.0	0.0
<b>Total</b>	<b>236</b>	<b>100.0</b>	<b>100.0</b>	<b>67,546</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2022 FFIEC Census Data 2016-2020 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. 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>							

**Small Business Lending**

The borrower distribution of small business lending is reasonable. As illustrated in Table 21, the bank originated 54.2 percent of loans to small businesses, which is below the percentage of small businesses operating in the AA. To augment the analysis, a review

of the three-year average aggregate lending data for small business lending noted a distribution of 50.8 percent of business loans in the AA by number were originated to small businesses, which was also below the demographic figure. While not a direct comparator, as the bank is not a CRA reporter, aggregate CRA figures are relevant as a proxy to ascertain demand for credit by small businesses. When taking these factors into consideration, the bank’s performance is reasonable and meets the small business credit needs of its AA.

**Table 21**

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Cheyenne MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	13	54.2	3,449	41.1	91.3
<b>Over \$1 Million</b>	9	37.5	3,950	47.0	5.8
<b>Revenue Unknown</b>	2	8.3	1,000	11.9	2.9
<b>Total</b>	24	100.0	8,399	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	6	25.0	286	3.4	
<b>\$100,001 - \$250,000</b>	4	16.7	710	8.5	
<b>\$250,001 - \$1 Million</b>	14	58.3	7,403	88.1	
<b>Total</b>	24	100.0	8,399	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	4	30.8	156	4.5	
<b>\$100,001 - \$250,000</b>	4	30.8	710	20.6	
<b>\$250,001 - \$1 Million</b>	5	38.5	2,583	74.9	
<b>Total</b>	13	100.0	3,449	100.0	
<i>Source: 2022 FFIEC Census Data 2022 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>					

**COMMUNITY DEVELOPMENT TEST**

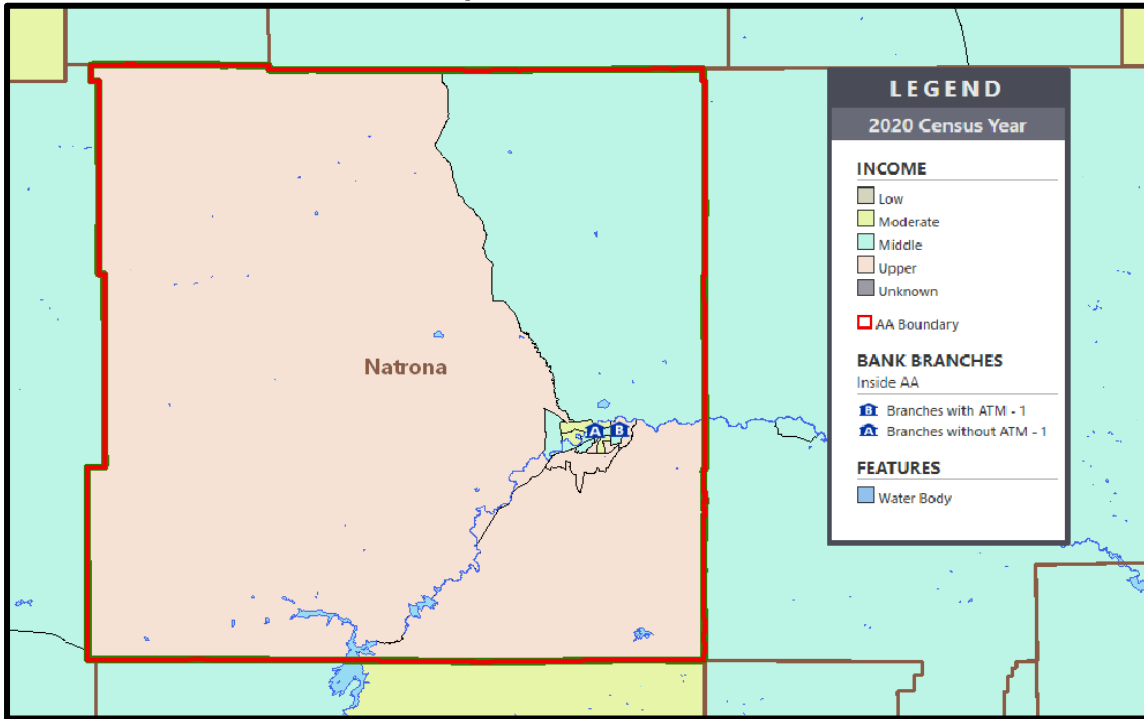
The bank’s CD performance demonstrates adequate responsiveness. Consistent with performance in the Casper MSA AA, the bank’s CD activity in this AA primarily focused on PPP loans that served to aid in revitalizing and stabilizing area LMI census tracts.

**Table 22**

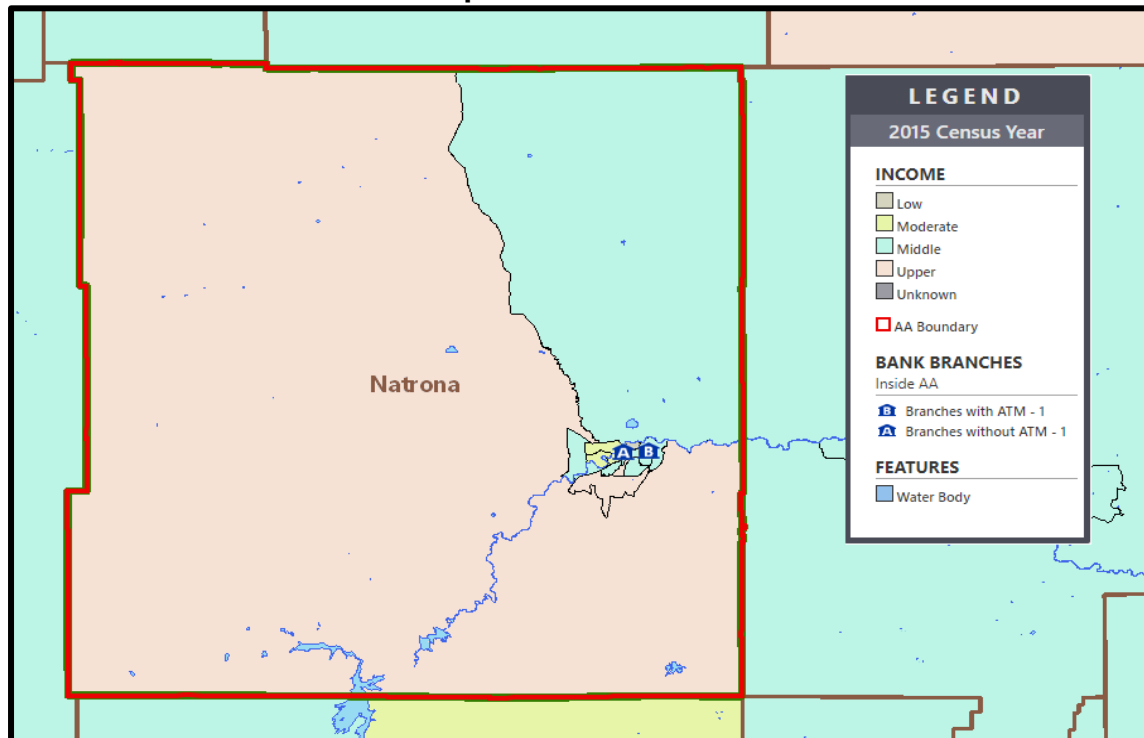
<b>Community Development Activity Assessment Area: Cheyenne MSA</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	0	0	3	174	2	10	5	184	15
<b>Community Services</b>	0	0	0	0	30	183	30	183	9
<b>Economic Development</b>	1	300	0	0	0	0	0	0	12
<b>Revitalization and Stabilization</b>	41	6,849	0	0	0	0	0	0	0
<b>Totals</b>	<b>42</b>	<b>7,149</b>	<b>3</b>	<b>174</b>	<b>32</b>	<b>193</b>	<b>35</b>	<b>367</b>	<b>36</b>

APPENDIX A – MAP OF THE ASSESSMENT AREA

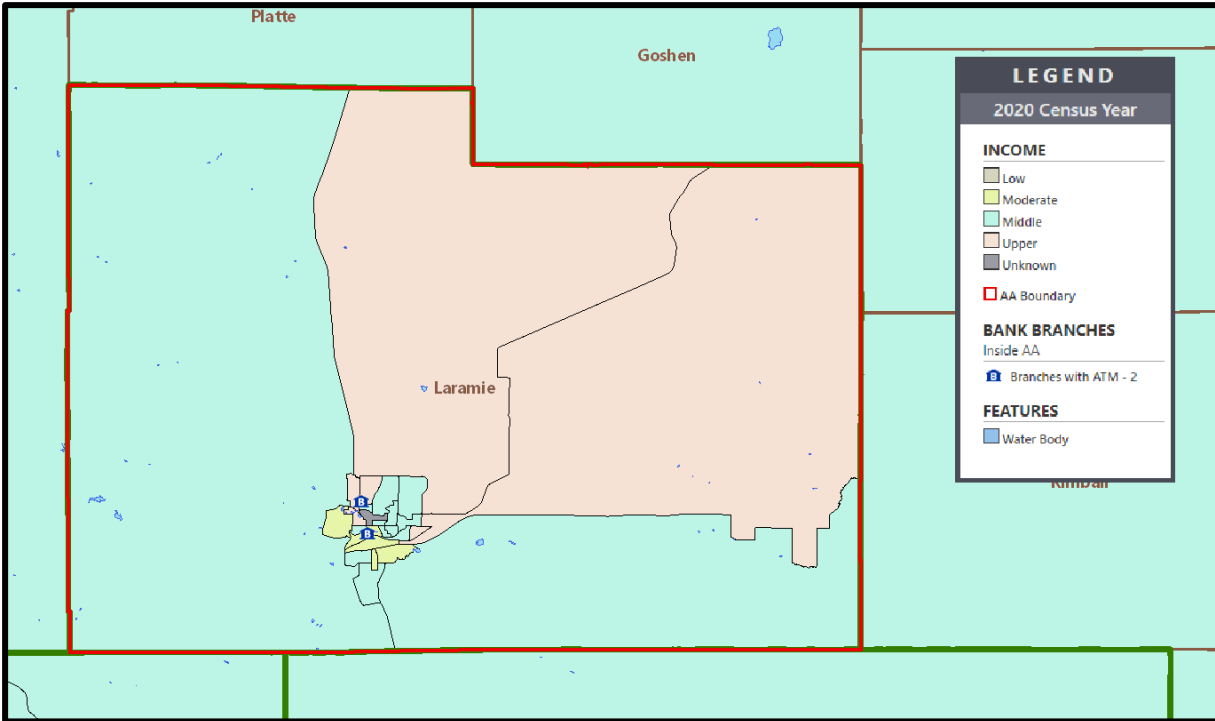
Casper MSA AA – 2022



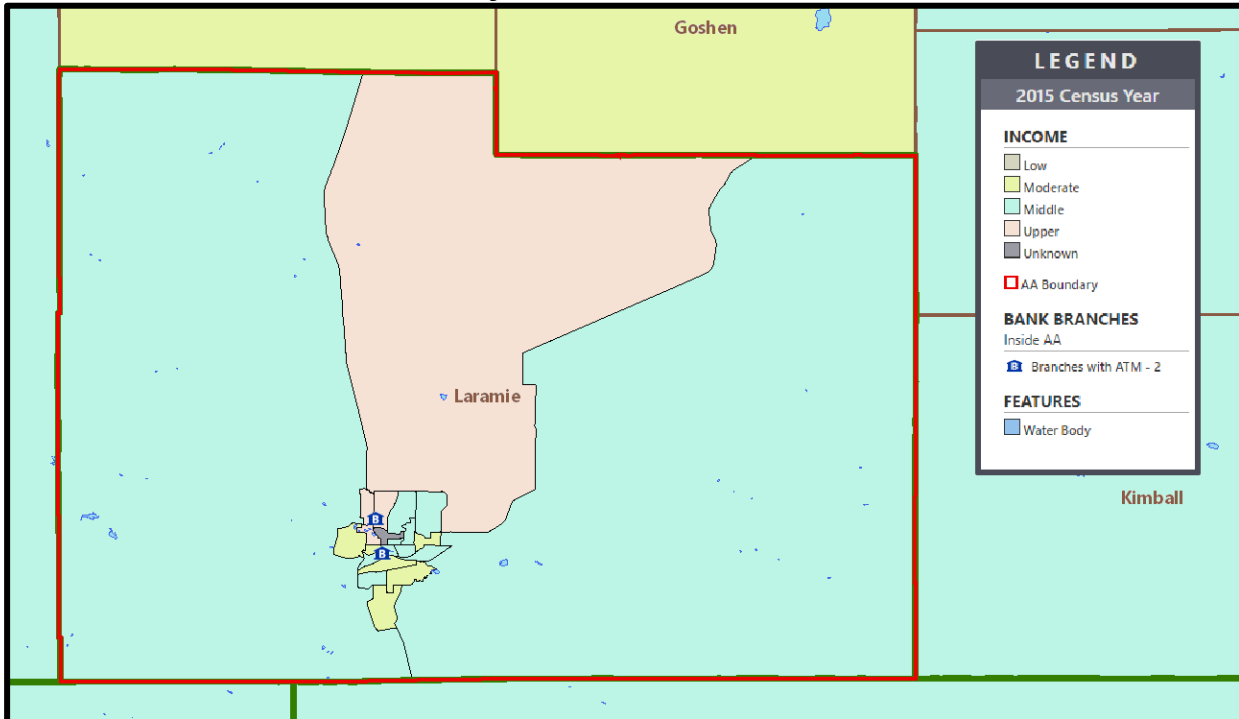
Casper MSA AA – 2021



Cheyenne MSA AA – 2022



Cheyenne MSA AA – 2021



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2022 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	0	0.0	0	0.0	0	0.0	3,956	19.2
Moderate	5	25.0	4,342	21.1	283	6.5	3,941	19.1
Middle	9	45.0	10,102	49.0	802	7.9	4,533	22.0
Upper	6	30.0	6,182	30.0	227	3.7	8,196	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>20</b>	<b>100.0</b>	<b>20,626</b>	<b>100.0</b>	<b>1,312</b>	<b>6.4</b>	<b>20,626</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	8,753	5,211	22.4	59.5	2,494	28.5	1,048	12.0
Middle	18,203	11,370	49.0	62.5	5,099	28.0	1,734	9.5
Upper	10,204	6,639	28.6	65.1	2,083	20.4	1,482	14.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>37,160</b>	<b>23,220</b>	<b>100.0</b>	<b>62.5</b>	<b>9,676</b>	<b>26.0</b>	<b>4,264</b>	<b>11.5</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	1,492	31.8	1,297	30.6	181	45.5	14	25.5
Middle	1,821	38.8	1,674	39.5	132	33.2	15	27.3
Upper	1,377	29.4	1,266	29.9	85	21.4	26	47.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,690</b>	<b>100.0</b>	<b>4,237</b>	<b>100.0</b>	<b>398</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>8.5</b>		<b>1.2</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	13	15.3	12	14.3	1	100.0	0	0.0
Middle	29	34.1	29	34.5	0	0.0	0	0.0
Upper	43	50.6	43	51.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>85</b>	<b>100.0</b>	<b>84</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.2</b>		<b>0.0</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-2**

2021 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
<b>Total AA</b>	<b>18</b>	<b>100.0</b>	<b>20,267</b>	<b>100.0</b>	<b>1,530</b>	<b>7.5</b>	<b>20,267</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	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
<b>Total AA</b>	<b>35,316</b>	<b>21,409</b>	<b>100.0</b>	<b>60.6</b>	<b>10,722</b>	<b>30.4</b>	<b>3,185</b>	<b>9.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	871	19.3	753	18.5	106	26.6	12	29.3
Moderate	413	9.1	341	8.4	68	17.0	4	9.8
Middle	2,263	50.1	2,095	51.3	156	39.1	12	29.3
Upper	973	21.5	891	21.8	69	17.3	13	31.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,520</b>	<b>100.0</b>	<b>4,080</b>	<b>100.0</b>	<b>399</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>8.8</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	4	4.8	3	3.6	1	100.0	0	0.0
Moderate	5	6.0	5	6.0	0	0.0	0	0.0
Middle	40	47.6	40	48.2	0	0.0	0	0.0
Upper	35	41.7	35	42.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>84</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.2</b>		<b>0.0</b>
<i>Source: 2021 FFIEC Census Data 2021 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>								

**Table B-3**

2022 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	4,533	17.3
Moderate	6	22.2	4,199	16.1	425	10.1	4,680	17.9
Middle	14	51.9	13,888	53.2	786	5.7	6,531	25.0
Upper	6	22.2	8,041	30.8	296	3.7	10,384	39.7
Unknown	1	3.7	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>27</b>	<b>100.0</b>	<b>26,128</b>	<b>100.0</b>	<b>1,507</b>	<b>5.8</b>	<b>26,128</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	8,135	3,289	11.3	40.4	4,023	49.5	823	10.1
Middle	24,200	16,641	57.1	68.8	5,423	22.4	2,136	8.8
Upper	11,506	9,239	31.7	80.3	1,587	13.8	680	5.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43,841</b>	<b>29,169</b>	<b>100.0</b>	<b>66.5</b>	<b>11,033</b>	<b>25.2</b>	<b>3,639</b>	<b>8.3</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	2,907	47.7	2,607	46.9	200	56.2	100	57.5
Middle	2,082	34.2	1,932	34.7	101	28.4	49	28.2
Upper	1,083	17.8	1,006	18.1	53	14.9	24	13.8
Unknown	18	0.3	15	0.3	2	0.6	1	0.6
<b>Total AA</b>	<b>6,090</b>	<b>100.0</b>	<b>5,560</b>	<b>100.0</b>	<b>356</b>	<b>100.0</b>	<b>174</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.3</b>		<b>5.8</b>		<b>2.9</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	7	4.1	7	4.2	0	0.0	0	0.0
Middle	72	42.4	71	42.5	1	33.3	0	0.0
Upper	91	53.5	89	53.3	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>167</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.2</b>		<b>1.8</b>		<b>0.0</b>
<i>Source: 2022 FFIEC Census Data 2022 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>								



**Table B-4**

2021 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
<b>Total AA</b>	<b>21</b>	<b>100.0</b>	<b>24,950</b>	<b>100.0</b>	<b>1,781</b>	<b>7.1</b>	<b>24,950</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	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
<b>Total AA</b>	<b>41,256</b>	<b>25,632</b>	<b>100.0</b>	<b>62.1</b>	<b>11,662</b>	<b>28.3</b>	<b>3,962</b>	<b>9.6</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	876	14.8	798	14.8	61	17.1	17	11.1
Middle	4,062	68.8	3,701	68.5	249	69.9	112	73.2
Upper	951	16.1	884	16.4	44	12.4	23	15.0
Unknown	19	0.3	16	0.3	2	0.6	1	0.7
<b>Total AA</b>	<b>5,908</b>	<b>100.0</b>	<b>5,399</b>	<b>100.0</b>	<b>356</b>	<b>100.0</b>	<b>153</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.4</b>		<b>6.0</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	9	5.2	8	4.7	1	33.3	0	0.0
Middle	132	76.7	130	76.9	2	66.7	0	0.0
Upper	31	18.0	31	18.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>172</b>	<b>100.0</b>	<b>169</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.7</b>		<b>0.0</b>
<i>Source: 2021 FFIEC Census Data 2021 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 C – ADDITIONAL LENDING TABLES  
Table C-1**

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Casper MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	3	2.0	2.4	623	1.8	1.2	4.0
Moderate	12	8.0	11.4	2,236	6.4	9.5	10.2
Middle	113	75.3	74.3	25,060	72.2	72.6	68.1
Upper	22	14.7	12.0	6,767	19.5	16.7	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>34,686</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	4	4.5	1.7	528	2.6	1.0	4.0
Moderate	12	13.5	9.3	2,885	14.4	7.5	10.2
Middle	62	69.7	72.0	14,023	70.1	69.9	68.1
Upper	11	12.4	17.0	2,565	12.8	21.7	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>20,001</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	4.0
Moderate	0	0.0	6.3	0	0.0	2.7	10.2
Middle	0	0.0	66.7	0	0.0	58.9	68.1
Upper	0	0.0	27.0	0	0.0	38.4	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	15.8	0	0.0	3.7	15.7
Moderate	0	0.0	10.5	0	0.0	41.7	6.4
Middle	1	100.0	63.2	281	100.0	43.2	68.8
Upper	0	0.0	10.5	0	0.0	11.4	9.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	7	2.9	2.1	1,151	2.1	1.2	4.0
Moderate	24	10.0	10.3	5,121	9.3	9.4	10.2
Middle	177	73.4	73.2	39,489	71.7	70.5	68.1
Upper	33	13.7	14.5	9,332	16.9	18.9	17.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>241</b>	<b>100.0</b>	<b>100.0</b>	<b>55,093</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2016-2020 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 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Casper MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	14	9.3	10.5	1,783	5.1	5.8	21.1
Moderate	39	26.0	23.9	7,248	20.9	17.3	16.4
Middle	37	24.7	22.4	8,309	24.0	22.4	21.7
Upper	53	35.3	23.2	15,889	45.8	31.7	40.7
Unknown	7	4.7	20.1	1,457	4.2	22.8	0.0
<b>Total</b>	<b>150</b>	<b>100.0</b>	<b>100.0</b>	<b>34,686</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	5.8	0	0.0	3.5	21.1
Moderate	23	25.8	17.7	4,053	20.3	13.7	16.4
Middle	28	31.5	20.7	5,322	26.6	19.1	21.7
Upper	32	36.0	26.3	9,767	48.8	32.5	40.7
Unknown	6	6.7	29.5	859	4.3	31.2	0.0
<b>Total</b>	<b>89</b>	<b>100.0</b>	<b>100.0</b>	<b>20,001</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	6.3	0	0.0	4.8	21.1
Moderate	0	0.0	20.6	0	0.0	12.3	16.4
Middle	0	0.0	20.6	0	0.0	21.0	21.7
Upper	0	0.0	47.6	0	0.0	49.3	40.7
Unknown	0	0.0	4.8	0	0.0	12.6	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	14	5.8	8.3	1,783	3.3	4.8	21.1
Moderate	62	25.8	20.8	11,301	20.6	15.6	16.4
Middle	66	27.5	21.5	13,756	25.1	20.8	21.7
Upper	85	35.4	24.8	25,656	46.8	32.1	40.7
Unknown	13	5.4	24.6	2,316	4.2	26.8	0.0
<b>Total</b>	<b>240</b>	<b>100.0</b>	<b>100.0</b>	<b>54,812</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2021 FFIEC Census Data 2016-2020 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-3**

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Cheyenne MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	81	25.6	21.4	16,714	19.2	16.2	22.8
Middle	157	49.5	56.8	44,568	51.3	57.1	50.7
Upper	79	24.9	21.7	25,670	29.5	26.7	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>317</b>	<b>100.0</b>	<b>100.0</b>	<b>86,952</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	34	14.8	15.8	7,149	12.4	12.4	22.8
Middle	111	48.5	56.3	27,364	47.4	55.7	50.7
Upper	84	36.7	27.9	23,210	40.2	31.9	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>57,723</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	12.5	36	15.3	8.7	22.8
Middle	1	50.0	55.1	200	84.7	53.5	50.7
Upper	0	0.0	32.4	0	0.0	37.8	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>236</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	21.1	0	0.0	8.7	26.7
Middle	0	0.0	63.2	0	0.0	73.5	57.2
Upper	0	0.0	15.8	0	0.0	17.9	16.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	116	21.1	18.0	23,899	16.5	14.1	22.8
Middle	270	49.2	56.7	72,337	49.8	56.7	50.7
Upper	163	29.7	25.3	48,880	33.7	29.3	26.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>549</b>	<b>100.0</b>	<b>100.0</b>	<b>145,116</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2016-2020 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-4**

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Cheyenne MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	30	9.5	7.3	4,497	5.2	4.1	19.5
Moderate	106	33.4	26.3	23,608	27.2	19.9	18.2
Middle	82	25.9	21.8	24,310	28.0	22.4	23.1
Upper	82	25.9	24.4	31,156	35.8	31.3	39.3
Unknown	17	5.4	20.1	3,381	3.9	22.3	0.0
<b>Total</b>	<b>317</b>	<b>100.0</b>	<b>100.0</b>	<b>86,952</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	16	7.0	7.6	2,879	5.0	4.4	19.5
Moderate	26	11.4	15.4	5,226	9.1	12.0	18.2
Middle	51	22.3	19.5	11,887	20.6	18.1	23.1
Upper	100	43.7	25.5	27,168	47.1	30.0	39.3
Unknown	36	15.7	32.1	10,563	18.3	35.5	0.0
<b>Total</b>	<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>57,723</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	1	50.0	8.0	36	15.3	3.6	19.5
Moderate	0	0.0	15.9	0	0.0	19.3	18.2
Middle	1	50.0	26.7	200	84.7	22.3	23.1
Upper	0	0.0	42.6	0	0.0	40.6	39.3
Unknown	0	0.0	6.8	0	0.0	14.1	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>236</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	47	8.6	7.5	7,412	5.1	4.3	19.5
Moderate	133	24.2	20.2	29,039	20.0	15.8	18.2
Middle	134	24.4	20.5	36,397	25.1	20.1	23.1
Upper	182	33.2	25.7	58,324	40.2	30.8	39.3
Unknown	53	9.7	26.2	13,944	9.6	29.0	0.0
<b>Total</b>	<b>549</b>	<b>100.0</b>	<b>100.0</b>	<b>145,116</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2021 FFIEC Census Data 2016-2020 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>							

## 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.