



Comptroller of the Currency
Administrator of National Banks

Midwestern District
2345 Grand Boulevard, Suite 700
Kansas City, Missouri 64108

PUBLIC DISCLOSURE

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

August 8, 1997

**Norwest Bank Montana, National Association
Charter Number 15564
175 North 27th Street
Billings, Montana 59101**

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusions, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.</p>
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GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Norwest Bank Montana, National Association, Billings, Montana**, prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency.

The evaluation represents the OCC's current assessment and rating of the institution's CRA performance based on an examination conducted as of August 8, 1997. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including LMI neighborhoods, consistent with safe and sound operations of the institution, and (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

ASSIGNMENT OF RATING

Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance in meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

DISCUSSION OF INSTITUTION'S PERFORMANCE

Institution's Rating:

Based on the findings presented below, Norwest Bank Montana, National Association (Norwest) has an **Outstanding Record of Meeting Community Credit Needs**.

The purpose of CRA is to ensure that financial institutions help meet the credit needs of their local communities. We rated this institution's CRA record Outstanding because:

- Norwest, in conjunction with its mortgage lending affiliate, Norwest Mortgage, Inc. (NMI), is the market leader in the origination of real estate-related loans within the Billings and Great Falls Metropolitan Statistical Areas (MSA). These loans are reportable under the Home Mortgage Disclosure Act (HMDA).
- Norwest and NMI combined (Norwest/NMI) originated a strong volume of HMDA reportable loans in low- and moderate-income (LMI) census tracts (CTs) and to LMI applicants within the Billings and Great Falls MSAs. In most instances, Norwest/NMI held the largest market share for loans originated in LMI CTs and to LMI borrowers.
- NMI was the market leader in originating governmentally insured, guaranteed or subsidized housing loans within the Great Falls, Montana MSA during 1995.
- Norwest demonstrated a strong commitment to improve the economic health of its delineated communities through its frequent participation in community development and redevelopment programs and projects that target LMI neighborhoods and families. Norwest was particularly supportive of community development and redevelopment efforts within the American Indian communities.

We based our rating primarily on the bank's performance in the two MSAs it serves, along with the larger non-MSA communities of Kalispell and Missoula. The conclusions we reached concerning the bank's CRA performance in its non-MSA delineated communities are consistent with the overall conclusions contained in this evaluation.

Bank Profile

Norwest is a wholly-owned subsidiary of Norwest Corporation, a multi-bank holding company headquartered in Minneapolis, Minnesota. Norwest Corporation had total assets of \$80 billion as of December 31, 1996.

Norwest operates 34 full-service banking offices serving 27 communities in Montana. Norwest is a business and consumer oriented bank with \$1.5 billion in assets, \$972 million in loans, and \$1.3 billion in deposits as of March 31, 1997. As of the same date, the loan portfolio mix was 34% real estate, 21% commercial, 39% consumer, and 6% other. In addition, 97% of Norwest's deposits consist of traditional core deposits.

Norwest affiliates provide lending services throughout the bank's delineated communities. NMI originates most of the purchase money and refinance residential real estate loans. Other affiliates provide student, credit card, and business financing as well as trust and investment services.

Community Profiles

Norwest has designated 25 delineated communities which include the Billings, Montana and Great Falls, Montana MSAs and 25 smaller non-MSA markets. Common credit and service needs throughout the delineated communities consist of housing loans for LMI individuals, basic banking and credit education, and loans to small businesses.

Based on 1990 census data, the population of Norwest's combined community delineation was approximately 605,000. The community contains 191 CTs and Block Numbering Areas (BNAs), of which 40, or 21%, are designated as LMI.

We used the following definitions of Norwest community delineations in our Evaluation of the bank's CRA performance:

Billings

The Billings delineated community includes all of the Billings, Montana MSA and is located in Yellowstone County. Based on 1990 census data, the population of this area approximates 113,000. Minorities comprise 4% of the population, including approximately 3% American Indian. The community contains 27 CTs, of which six, or 22%, are designated as LMI. The Department of Housing and Urban Development's (HUD) estimated 1997 median family income for this MSA is \$43,900.

Great Falls

The Great Falls delineated community includes all of the Great Falls, Montana MSA and is located in Cascade County. Based on 1990 census data, the population of the delineated community was approximately 77,000. Minorities comprise 7% of the population, including 4% American Indian. The community contains 24 CTs, of which seven, or 29% are designated LMI. HUD's estimated 1997 median family income for this MSA is \$37,100.

Non-MSA Delineated Communities:

Kalispell

The Kalispell delineated community consists of all of Flathead County and is located in northwestern Montana. Based on 1990 census data, the population approximates 59,000. American Indians comprise 2% of the population. The community contains 14 BNAs, one of which (7%) is designated LMI. HUD estimates the 1997 state-wide non-MSA median family income for Montana at \$36,100.

Missoula

The Missoula delineated community includes all of Missoula County which is located in the west-central portion of Montana. Based on 1990 census data, the population of the delineated community was approximately 72,000. American Indians comprise 2% of the population. The community contains 16 BNAs of which four, or 24 %, are designated LMI.

Please refer to the bank's CRA Statement for detailed information on the remaining non-MSA delineated communities.

Reasonableness of Delineated Community

Norwest's delineated communities are reasonable and do not arbitrarily exclude any LMI areas. The delineations include areas surrounding branch locations and contain a substantial majority of the bank's 1996 loan originations, including 92% of the HMDA loans, 84% of the small business and small farm loans, and 84% of its consumer loans and lines of credit. These ratios are based only on those loans for which Norwest determined the location of the associated property or borrower.

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Assessment Factor A - Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

- **Management maintains ongoing, meaningful contact with a wide range of individuals and groups representing various community interests.**

Norwest has developed a process that incorporates direct contact with individuals representing housing services, small businesses and community development and government agencies. In addition, bank management uses focus groups and formal surveys to ascertain community credit needs. The bank's 1996 Community Reinvestment Act Statement lists the nature of these organizations and the bank's involvement with them.

Assessment Factor C - The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

- **The Board of Directors and senior management have developed an effective program to meet the credit needs of the bank's communities.**

Norwest uses the Community Reinvestment Act Community Marketing Initiative (CMI) planning process. This process provides the framework for determining community credit needs and developing the bank's response to those needs. The plan is monitored quarterly, updated annually and incorporates information such as demographic data, ascertainment efforts, marketing strategies, and lending goals. A CMI plan is prepared for each branch in order to respond to any special local needs.

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

Assessment Factor B - The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

- **The Board and senior management have implemented a sound marketing program designed to reach all segments of Norwest's communities.**

Management annually develops a marketing plan designed to promote various products and services throughout the bank's communities. Advertising, directed by Norwest corporate marketing staff, focuses on broad based general media including television, radio, and major newspapers. Bank-wide direct mail, brochures, and product point-of-sale information are also produced.

Managing officers initiate local marketing efforts. Working with the bank's marketing unit, they develop a customized marketing plan designed for their local market which includes newspapers, direct mail, and participation in community events. This allows each market to tailor its marketing efforts to its community.

Assessment Factor I - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

- **Norwest/NMI has made a strong effort to address identified community credit needs by originating a substantial volume of housing, small business, small farm, and consumer loans within its communities.**

Norwest offers flexible real estate credit terms and conditions to LMI individuals through its Community Home Ownership Program (CHOP). During 1995 and 1996, Norwest extended 226 purchase money CHOP loans totaling \$10 million, and 158 loans for \$7.9 million, respectively. For additional historical CHOP lending information, please refer to Norwest's 1995 and 1996 CRA Statements.

As detailed in the following chart, Norwest/NMI have taken a leadership role in lending conventional purchase money, refinance, and home improvement real estate-related loans during 1995 in both the Billings and Great Falls MSAs.

1995 HMDA Lending				
	Number of Loans	Market Share Percent	Dollar of Loans (000s)	Market Share Percent
Billings MSA				
Norwest/NMI	409	15%	\$25,306	17%
Closest Competitor	394	15%	\$16,180	11%
Great Falls MSA				
Norwest/NMI	847	50%	\$24,805	37%
Closest Competitor	110	6%	\$7,158	11%

During 1995, the average loan size for Norwest within the Billings and Great Falls MSAs was \$23,000 and \$15,000, respectively. NMI's average loan size within those same markets was \$92,000 and \$84,000, respectively.

In 1995, NMI reported 140 conventional loan originations totaling \$13.9 million in Missoula, 190 loans totaling \$20 million in Kalispell, and 232 loans totaling \$16.7 million in the remaining non-MSA delineated communities. Given regulation requirements, Norwest was not required to report 1995 HMDA loans originating in Kalispell or Missoula. As a result, combined totals for Norwest/NMI are not available for 1995.

In 1996, Norwest/NMI increased its HMDA lending in both delineated communities. In Billings, Norwest/NMI originated 536 HMDA loans totaling \$36.4 million and 948 loans totaling \$42.6 million in Great Falls. Market share data for 1996 was not available at the time of this review.

In addition, Norwest/NMI have successfully originated conventional HMDA-reportable loans in non-MSA communities. In 1996, Norwest/NMI originated 448 loans totaling \$25 million within the Kalispell delineation and 364 loans totaling \$24.6 million within the Missoula delineation. Because the Kalispell and Missoula delineated communities are not within the boundaries of an MSA, market share data would be skewed because many local banks are not HMDA reporters. Norwest/NMI also originated 907 conventional HMDA loans totaling \$35.4 million within the remaining non-MSA delineated communities.

Norwest also originates direct and indirect consumer installment loans and lines of credit. Per year-end 1995 bank-prepared reports, Norwest had outstanding loan and line balances totaling \$278 million to persons living within Norwest's delineated communities. This total represents

79% of all consumer loans and lines of credit. These bank-prepared figures include the outstanding balances of home improvement loans, which are included above in the discussion of HMDA lending. In 1995, Norwest originated 18,211 non-housing related consumer loans and lines of credit totaling \$132 million within its delineated communities and 17,591 loans totaling \$143 million in 1996.

In 1996, Norwest began tracking the number, amount, and geographic location of its small business and small farm loan originations in compliance with the revised CRA. During 1996, Norwest originated 1,574 small business loans and 1,332 small farm loans totaling \$142 million and \$69 million respectively. Of that amount, 86% of the business loans and 81% of the farm loans were extended to borrowers located within Norwest's delineated communities.

Norwest Bank South Dakota, National Association extends conventional student loans on behalf of Norwest. No annual fee student credit cards are offered through Norwest Bank Iowa, National Association.

Assessment Factor J - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses, or small farms.

- **Norwest/NMI actively participate in government-related lending programs for small business and housing. In 1995, NMI was the dominant originator of government-related housing loans within the Great Falls MSA.**

NMI originates a strong volume of government-related real estate loans within the Great Falls MSA. In 1995, NMI originated \$14 million, or 191 loans, to applicants living within the Great Falls MSA. This volume represents 34% of the total market by number of loans and 37% by dollar volume. The closest competitor originated 106 loans totaling \$7.5 million and held 19% of the market share by number and 20% by dollar volume. In 1996, NMI increased its volume to \$15.8 million, or 201 loans, within the Great Falls MSA.

In 1995, NMI held the seventh highest market share within the Billings MSA, originating 89 government-related housing loans for \$6.7 million. This volume represents 8% of the total market by number and dollar volume. The market leader originated 263 loans totaling \$18.6 million and held 23% of the market by number and dollar volume. As in Great Falls, NMI increased its lending during 1996, with 123 loans totaling \$8.9 million.

NMI successfully originated government-related real estate loans in its non-MSA delineated communities. On a combined basis, NMI originated \$6.4 million, or 75 loans, within the Kalispell and Missoula delineated communities during 1995, compared to \$6.8 million, or 79 loans, in

1996. NMI originated \$3.6 million, or 58 loans, in the remaining non-MSA delineated communities in 1995 compared to \$5.6 million, or 100 loans, in 1996.

The above government-related real estate loan programs include those sponsored by the Federal Housing Authority (FHA), the Department of Veteran's Affairs (VA), and the Farmers Home Administration (FmHA) for purchase money and refinance purposes.

In addition to traditional business banking, Norwest is a Small Business Administration (SBA) designated Preferred Lender. In 1995, Norwest originated 130 SBA loans totaling \$12.6 million. The volume declined during 1996 to 77 SBA loans for \$6.6 million. According to bank management, the volume of SBA loans declined throughout the state in 1996 and is attributable to an October 1995 change in the SBA guaranteed loan program which increased the cost of this product.

Norwest Bank South Dakota, National Association continues to originate student loans through the government guaranteed Stanford loan program on behalf of Norwest.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Assessment Factor E - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

- **Norwest/NMI shows excellent distribution of loans within and throughout its delineated communities, particularly in its penetration of loans to LMI areas and borrowers.**

As demonstrated in the following chart, Norwest/NMI is a market leader in the origination of HMDA loans in LMI CTs within the Billings and Great Falls MSAs.

1995 HMDA Lending in LMI CTs				
	Number of Loans	Market Share Percent	Dollar of Loans (000s)	Market Share Percent
Billings MSA				
Norwest/NMI	70	14%	\$2,801	12%
Closest Competitor	66	13%	\$3,820	17%
Great Falls MSA				
Norwest/NMI	155	47%	\$4,006	33%
Closest Competitor	40	12%	\$2,040	17%

In 1996, Norwest/NMI increased its volume of HMDA loans within LMI CTs to 93 loans totaling \$4.3 million within the Billings MSA and 157 loans totaling \$4.5 million within the Great Falls MSA.

Norwest/NMI also originated a strong volume of HMDA loans to LMI borrowers within the Billings and Great Falls MSAs during 1995. This is detailed as follows:

1995 HMDA Lending to LMI Borrowers				
	Number of Loans	Market Share Percent	Dollar of Loans (000s)	Market Share Percent
Billings MSA				
Norwest/NMI	150	14%	\$6,969	15%
Closest Competitor	140	13%	\$6,398	14%
Great Falls MSA				
Norwest/NMI	276	50%	\$7,147	42%
Closest Competitor	48	8%	\$2,225	13%

In 1996, Norwest/NMI increased its volume of lending to LMI borrowers in both MSAs. Norwest/NMI originated 196 loans for \$9.8 million in the Billings MSA and 385 loans for \$10 million in the Great Falls MSA.

As explained in the following chart, Norwest/NMI lending to LMI individuals within the bank's 27 community delineation is reasonable. The following table displays the percentage of HMDA reportable loan originations to applicants of different income levels.

HMDA Lending as % of Total Number of Loan Originations

Income Level of Applicant	Norwest Lending				NMI Lending			
	1995 Lending Volume	1995 Lending Percent	1996 Lending Volume	1996 Lending Percent	1995 Lending Volume	1995 Lending Percent	1996 Lending Volume	1996 Lending Percent
LMI	613	27%	594	23%	304	17%	471	20%
Middle-Income	565	25%	706	27%	591	32%	592	25%
Upper-Income	1,093	47%	1,227	48%	925	51%	903	38%
Income Not Avail.	34	1	59	2%	8	.0%	397	17%

Middle-Income represents applicants with income 80% - 120% of median income.

Upper-Income represents applicants with income greater than 120% of median income.

In addition to HMDA data, bank generated reports of all other direct and indirect loans and lines of credit show a reasonable distribution of lending originations throughout Norwest's delineated communities. During 1996, 16% of all non-HMDA consumer loans and lines of credit were extended to borrowers living in LMI CTs within the Billings and Great Falls MSAs combined.

Assessment Factor G - The institution's record of opening and closing offices and providing services at offices.

- **Norwest's offices are readily accessible to all segments of its communities. Bank management regularly reviews business hours and services to ensure they meet the customers' needs.**

Norwest operates 34 full service banking offices throughout its delineated communities. Four branches offer investment management and trust services on site and nine branches offer NMI

services. Other branches offer these services by appointment only or by calling a toll-free telephone number.

Market managers regularly review service delivery and branch hours to ensure hours meet local needs. The bank also offers 24-hour toll-free telephone service for conducting deposit transactions, making limited credit transactions, and receiving account information. Refer to the Norwest Location Guide for specific information on branch locations and hours.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Assessment Factor D - Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement(s).

- **We found no practices intended to discourage applicants for any type of credit listed on the bank's CRA Statement.**

The bank solicits applications from all portions of its communities, including LMI areas. Corporate policies set forth basic fair lending requirements. All loan-related employees receive regular, comprehensive training on fair lending regulations. The bank has an independent second review program for all potential HMDA reportable denials.

Assessment Factor F - Evidence of prohibited discriminatory or other illegal credit practices.

- **The bank meets the substantive provisions of antidiscrimination laws and regulations.**

We did not identify any instances in which Norwest denied credit to similarly situated applicants based on the applicant's gender. We performed a comparative analysis of indirect and direct automobile loan applications and other unsecured consumer loans to determine whether applicants with comparable qualifications received similar treatment. The sample included 28 denied female and 112 approved male applicants who applied for credit between January 1, 1996 and December 31, 1996.

V. COMMUNITY DEVELOPMENT

Assessment Factor H - The institution's participation, including investments, in local community development and redevelopment projects or programs.

- **Norwest demonstrated a strong commitment to support community development and redevelopment programs within its delineated communities by providing financial support and technical assistance to various organizations and community groups.**

Examples of community development and redevelopment involvement by Norwest, include:

Billings

- In 1996, Norwest provided a \$956,000 construction loan for a 24 unit low-income senior citizen housing complex. The complex is adjacent to the Crow Indian Reservation, 50 miles southeast of Billings. The FMHA provided long-term financing under section 515(b) of its Rural Rental Housing Program which requires all renters to meet LMI requirements.

Great Falls

- In 1996, Norwest provided \$1.2 million in permanent financing to a 48 unit housing complex in Great Falls. The project received Federal low-income tax credits and occupants meet well-defined LMI guidelines.
- In 1996, Norwest provided \$270,000 to the Neighborhood Housing Services, Inc., of Great Falls. The proceeds were used to provide down payment and closing cost assistance to moderate-income home buyers.

Missoula

- In 1996, Norwest provided a \$101,000, 60-day bridge loan to a nonprofit housing group in Missoula to acquire real estate lots for a LMI housing project. The organization constructed ten homes for single parent low-income families.
- In 1996, Norwest provided a \$25,000 operating loan to a nonprofit organization in Missoula. The organization provides child care services to parents that are attempting to move from welfare to self sufficiency. The vast majority of families enrolled in the program receive Aid to Families with Dependent Children.

Other Delineated Communities

- In 1996, the bank provided a \$600,000 operating loan to a private charitable foundation serving the residents of the Northern Cheyenne Indian Reservation. A substantial portion of the reservation lies within the bank's Forsyth, Montana delineated community.

- In 1996, Norwest provided a \$145,000 six-month bridge loan to a nonprofit company for a 60-unit assisted living center in Butte. The nonprofit company is a joint venture between the Human Resource Council, District Twelve, and the National Affordable Housing Network. The National Affordable Housing Network works to make low cost housing more affordable through the use of energy efficient construction methods. To qualify for these apartments, residents must be 63 or older and meet strict LMI requirements.

Assessment Factor K - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

- **Norwest's efforts to meet community credit needs are consistent with its size and resources.**

Norwest has sufficient resources to meet the credit needs of its communities. The bank also has access to additional resources through its Norwest affiliates, including NMI, Norwest Investment Services, Inc., Norwest Funding, Inc., and Norwest Business Credit, Inc. Norwest has demonstrated its willingness to support the development and implementation of programs and products to meet community growth and redevelopment needs. No legal impediments or factors limit the bank's efforts.

Assessment Factor L - Any other factors that, in the regulatory authority's judgement, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

- **Norwest has engaged in other meaningful activities that contribute to its efforts to help meet the credit needs of its communities.**

During 1996, Norwest provided technical assistance to several community service organizations to obtain \$817,000 in grants from the Federal Home Loan Bank (FHLB) of Seattle. Bank managers helped prepare and submit the applications to the FHLB on behalf of the organizations. In addition, Norwest managed the disbursement of these funds which were used to build affordable housing for LMI families within the bank's delineated communities.

Norwest supports nonprofit organizations that benefit LMI families and small business and farms through direct financial contributions and by providing technical expertise. Examples of this support include bank management serving on boards of directors, providing speakers for financial and economic development topics, and consumer credit counseling.

ADDITIONAL INFORMATION

Examination Profile

The scope of our examination primarily consisted of an analysis of the bank's 1995 and 1996 CRA performance. We reviewed information prepared by bank management and obtained through contacts with community groups and government offices.

Home Mortgage Disclosure Act

Federal law requires Norwest to gather home loan data for the MSA Norwest serves. Individuals may obtain this information from the following offices:

Billings, Montana #880

Bill Arnold, Planning Director
Yellowstone County Board of Planning
510 N. Broadway - 4th floor
Billings, MT 59101
(406) 657 - 8246

Great Falls, Montana #3040

John Mooney, Director
Great Falls City/County Planning Board
Great Falls Civic Center
P.O. Box 5021
Great Falls, MT 59403
(406) 771 - 1180

The Office of the Comptroller of the Currency (OCC) is the regulatory agency responsible for the supervision of this bank. If you should have comments regarding this bank's performance under the CRA or questions regarding the Act, contact the OCC Midwestern District Office, 2345 Grand Boulevard, Suite 700, Kansas City, Missouri 64108.