



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

April 25, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Wyoming National Bank
Charter Number 23802**

**1700 N. Federal
Riverton, WY 82501**

**Comptroller of the Currency
Salt Lake City (Utah, Montana, Wyoming, Idaho)
2795 East Cottonwood Parkway, Suite 390
Salt Lake City, UT 84121**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The factors supporting the bank's overall rating include the following:

- Wyoming National Bank's (WNB) average loan-to-deposit ratio since the last examination is reasonable.
- The bank's record of lending to borrowers with different incomes and to businesses of different sizes is more than reasonable.
- The bank originated a substantial majority of its loans in the assessment area.
- WNB's geographic distribution of loans in the assessment area is satisfactory.
- WNB did not receive any consumer complaints about its performance in helping to meet the credit needs of the assessment area during the evaluation period.
- We found no evidence of illegal discrimination or other illegal credit practices.

DESCRIPTION OF INSTITUTION

Wyoming National Bank (WNB) is a \$67 million institution located in rural central Wyoming and headquartered in Riverton, Wyoming. WNB is wholly owned by Wyoming National Bancorporation, Inc., a single-bank holding company. The evaluation period for this examination extends from June 23, 2000 through April 26, 2006.

WNB is a community bank and operates three banking offices within Fremont County, Wyoming. The main office is located in Riverton, and branch locations are in Riverton and Lander.

WNB offers traditional services and loan products normally associated with a rural community bank. As of December 31, 2005, net loans totaled \$44 million, representing 66 percent of total assets. WNB competes in Fremont County with three federal credit unions, one state bank, and four branches of national banking companies. There are no legal or financial impediments that limit the bank's ability to meet the credit needs of the assessment area. WNB received a "Satisfactory" rating at the last CRA examination dated June 23, 2000.

WNB's primary loan products by dollar volume are commercial and industrial loans (20 percent) and agricultural loans (19 percent). The bank's primary loan product by number of loans made is consumer loans. Accordingly, our rating of the bank's CRA performance is based on the analysis of these three products.

Refer to the bank's CRA Public File for further information.

DESCRIPTION OF FREMONT COUNTY, WYOMING

The bank designated Fremont County, Wyoming, as its assessment area (AA). This AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. Based on 2000 U.S. census data, the AA is comprised of 9 census tracts. Six census tracts (67 percent of total) are designated as middle-income, and the three remaining (33 percent of total) are designated as moderate-income. The Department of Housing and Urban Development (HUD) 2005 updated non-MSA median-family income for non-MSA portions of Wyoming is \$54,950. Forty-seven percent of the 9,495 families residing within the AA are designated low- or moderate-income based on annual income as a percentage of the non-MSA median-family income.

We made one community contact in the course of this examination. We spoke with a representative from an economic development organization. This individual indicated the primary credit need of the community has been small businesses/small farm loans.

Refer to the bank's CRA Public File for more information.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

Wyoming National Bank's (WNB) average loan-to-deposit ratio since the last examination is reasonable. The loan-to-deposit ratio is more than reasonable compared to the competition and considering the bank's resources and capacity to lend, demographic and economic factors, and the lending opportunities available in the assessment area. The bank's 76 percent average loan-to-deposit ratio compares favorably to the ratios of similarly situated banks. Competing banks' ratios ranged from 60 percent to 88 percent and averaged 72 percent.

Lending in Assessment Area

The bank originated a substantial majority of its loans in the assessment area. Based on our sample, WNB originates 92 percent of its loans by number and 96 percent by dollar amount within its assessment area.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The bank's record of lending to borrowers with different incomes and to businesses of different sizes is more than reasonable.

WNB's performance in making consumer loans to borrowers of varying incomes is strong. The bank's distribution of consumer loans compared to percentage of assessment area low- or moderate-income households significantly exceeds the demographic comparators. Based on our sample, the bank originates 35 percent of its consumer loans to low-income households and 50 percent of its consumer loans to moderate-income households, which compares favorably to assessment area demographics of twenty-seven percent of assessment area households being low-income, and 19 percent being moderate-income. We obtained the demographic information from the 2000 U.S. Census.

WNB's distribution of loans to farms of different sizes is reasonable. The bank's percentage of the number of farm loans that it originated and purchased to farms with revenues of \$1 million or less compared to the percentage of assessment area farms with revenues of \$1 million or less exceeds the demographic comparators and exceeds the standard for satisfactory performance. Based on our sample, the bank originates 95 percent of its farm loans, by number, to farms with revenues of \$1 million or less compared to the assessment area demographic comparator of 90 percent. Three percent of assessment area farms did not report revenue size. We obtained the demographic information from Dunn and Bradstreet reports.

WNB's performance in making loans to small businesses appears to be satisfactory. The distribution of loans to businesses of different sizes is difficult to analyze because more than 31 percent of assessment area businesses did not report revenue size. Based on our sample, the bank originates 95 percent of its business loans to businesses with revenues of \$1 million or less compared to the assessment area demographic comparator of 94 percent. We obtained the demographic information from Dunn and Bradstreet reports.

Geographic Distribution of Loans

WNB's geographic distribution of loans in the assessment area is satisfactory.

The geographic distribution of consumer loans is good. We sampled consumer loans originated in the assessment area since the prior evaluation. Based on our sample, 37 percent of the bank's total consumer loans by number were made in moderate-income census tracts. This compares favorably with the percentage of AA households in moderate-income census tracts of 30 percent.

The bank's geographic distribution of small loans to businesses is poor. Based on our sample, the bank makes 5 percent of its small business loans to businesses located in moderate-income census tracts, which compares poorly to census data from 2000 showing 26 percent of AA businesses are located in moderate-income census tracts.

The geographic distribution of agricultural loans is good. Of the 20 agricultural loans sampled, loans originated in moderate-income geographies represented 62 percent of total loans by number. This compares favorably to area demographics that indicate 12 percent of all farms are located within moderate-income geographies.

Responses to Complaints

WNB did not receive any consumer complaints about its performance in helping to meet the credit needs of the assessment area during the evaluation period.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.