



SMALL BANK

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

PUBLIC DISCLOSURE

April 14, 2004

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**American National Bank of Rock Springs
Charter Number 17656**

**2508 Foothills Boulevard
Rock Springs, WY 82902**

**Comptroller of the Currency
Salt Lake City (Montana, Wyoming, Utah, and 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**.

- American National Bank of Rock Springs' (ANBRS) average loan-to-deposit ratio since the last examination is good.

ANBRS exceeds the standard for satisfactory performance. 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 70 percent average loan-to-deposit ratio compares favorably to the ratios of similarly situated banks. Competing banks' ratios ranged from 50 percent to 69 percent and averaged 56 percent.

- The bank has a satisfactory record of lending to borrowers with different incomes.

ANBRS's distribution of home loans compared to percentage of assessment area low- or moderate-income families mirrors the demographic comparator and meets the standard for satisfactory performance. Based on our sample, the bank originates 15 percent of its home loans to low-income families and 15 percent of its home loans to moderate-income families. Fifteen percent of assessment area families are low-income, and 14 percent are moderate-income. We obtained the demographic information from the 2000 United States Census.

The distribution of loans to businesses of different sizes is difficult to compare because more than 16 percent of assessment area businesses did not report revenue size. The bank's percentage of the number and dollar amount of business loans that it originated and purchased to businesses with revenues of \$1 million or less compared to the percentage of assessment area businesses with revenues of \$1 million or less approximates the demographic comparator and meets the standard for satisfactory performance. Based on our sample, the bank originates 72 percent of its commercial real estate loans to small businesses compared to the assessment area demographic comparator of 77 percent. We obtained the demographic information from Dunn and Bradstreet reports.

- The bank originated a majority of its loans in the assessment area.

Based on our sample, ANBRS originates 85 percent its loans by number and 76 percent by dollar amount within its assessment area.

- An analysis of the geographic distribution of loans was not applicable because none of the assessment area's five census tracts are low- or moderate-income geographies.
- ANBRS 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

American National Bank of Rock Springs is a \$50 million institution located in southwestern Wyoming. ANBRS has one office with an attached automated teller machine. The bank is 100 percent owned by Rock Springs American Bancorporation, Inc., a one-bank holding company. ANBRS has no subsidiaries or banking affiliates.

The bank's primary loan products are commercial real estate loans and conventional one-to-four family residential mortgage loans. ANBRS received a "Satisfactory" rating at the last CRA examination dated October 25, 1999. There were no legal or financial factors that impede the bank's ability to help meet the credit needs of the assessment area. Refer to the bank's *CRA Public File* for more information.

DESCRIPTION OF SWEETWATER COUNTY, WYOMING

ANBRS's assessment area comprises all of Sweetwater County, Wyoming, and is not part of a metropolitan statistical area. The assessment area consists of two middle-income census tracts and three upper-income census tracts. For 2003, the U.S. Department of Housing and Urban Development (HUD) estimates the non-metropolitan median income for Wyoming at \$50,700. The largest employers in the area are (by number of employees) FMC Wyoming Corporation, Sweetwater County School District No. 1, General Chemical Company, OCI, and Halliburton. ANBRS's competition in the assessment area comes from branches of three large national banks, a nationally chartered community bank, two state chartered community banks, and six local credit unions.

We contacted a community development official in the assessment area to discuss economic conditions and credit needs. This individual stated that the local economy is presently booming driven by natural gas exploration and extraction. The influx of workers associated with the increased natural gas activity has resulted in a shortage of affordable housing, and this is presently the most pressing credit need in the assessment area. The individual said the local financial institutions are generally meeting the assessment area's credit needs.

Please refer to the bank's *CRA Public File* for more information.