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Comptroller of the Currency  
Administrator of National Banks

**SMALL BANK**

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## **PUBLIC DISCLOSURE**

June 23, 2000

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

**Wyoming National Bank  
Charter Number 23802**

**1700 North Federal  
Riverton, Wyoming 82501**

**Comptroller of the Currency**

**2855 East Cottonwood Parkway, Suite 370  
Salt Lake City, Utah 84121**

**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, conclusion or, opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

## GENERAL INFORMATION

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of Wyoming National Bank, Riverton, Wyoming as prepared by **The Comptroller of the Currency**, the institution's supervisory agency, as of June 23, 2000. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**. The factors supporting the bank's overall rating include the following:

- The bank's quarterly average loan-to-deposit ratio, although not yet stable, is reasonable and comparable to that of similarly situated institutions.
- A substantial majority of the bank's loans are made within its assessment area.
- The bank's loans are well distributed to individuals of different income levels and to businesses and farms of different sizes.
- The bank's lending patterns show a reasonable dispersion of loans in moderate-income geographies.

## DESCRIPTION OF INSTITUTION

Wyoming National Bank (WNB) is a community bank providing general banking services through its single location in Riverton, Wyoming. The bank was chartered in 1999. As of March 31, 2000, WNB had total assets of nearly \$16 million. The bank has no subsidiaries or banking affiliates.

WNB's primary business focus is on agricultural and commercial lending. As of March 31, 2000, net loans represented 76 percent of total assets. Agricultural and commercial loans accounted for 52 percent of average gross loans with loans for farmland and commercial real estate accounting for an additional 24 percent.

This is WNB's first CRA evaluation. The bank has no legal or financial circumstances that impede its ability to help meet the credit needs of the community.

## DESCRIPTION OF FREMONT COUNTY, WYOMING

WNB's assessment area includes all of Fremont County, Wyoming, and consists of 11 Block Numbering Areas (BNAs). Census data from 1990 listed the assessment area population at 33,662. A more recent estimate places Fremont County's population around 36,000. The county encompasses 5.9 million acres of land, 2 million of which comprise the Wind River Indian Reservation. The reservation is home to 9000 members of the Shoshone and Northern Arapaho Tribes. Riverton is the largest city in the county with a 1997 estimated population of 10,060. The assessment area meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The 1999 Wyoming statewide non-metropolitan median family income (MFI) is \$42,800. The following table summarizes the income levels of individual BNAs and families located within WNB's assessment area, compared to the statewide MFI:

Income Level	Number of BNAs	Percent of Families
Low Income (< 50% MFI)	0	27%
Moderate Income (50-79% MFI)	4	21%
Middle Income (80-119% MFI)	7	25%
Upper Income (120+% MFI)	0	27%
Total	11	100%

Fremont county's largest employers are the Wyoming State Training School (health services), Axiom, Inc., Columbia Riverton Memorial Hospital, Lander Valley Regional Medical Center/Pine Ridge Psychiatric Institute, School District 25 and Central Wyoming College. The tourist industry also plays an important role in the area's economy due to the county's proximity to Yellowstone and Grand Teton National Parks.

Competition is high with 12 community banks and branches of regional and large banks operating in the assessment area. Several credit unions also operate in the county. In addition, Tribal credit agencies have been formed to extend loans on the Wind River Indian Reservation.

We interviewed two community contacts for this examination. Both are lifelong Wyoming residents. They described the local economy as strong. Neither identified a pressing credit need in the community that local financial institutions were not meeting. While expressing the opinion that affordable housing was readily available, one stated that there may be a need for additional efforts on the part of local financial institutions in addressing housing needs on the reservation. Both individuals stated that the local institutions were doing a “good job” of meeting their community’s credit needs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

### ***Loan-to-Deposit Ratio***

The bank's average loan-to-deposit (LTD) ratio is reasonable. WNB's average loan-to-deposit ratio was 95.6% based on the three quarters ending March 31, 2000. On March 31, 2000, the bank’s LTD ratio was 91.8%. WNB's LTD ratio is high, but has declined each quarter since the bank’s opened because deposits have grown at a faster rate than loans.

For the same three quarters, other area banks’ averaged LTD’s of 70.2%, 73.0%, and 61.6%. While WNB's ratio is well above these banks, WNB is new and its LTD has not stabilized.

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

WNB’s lending patterns reflect a satisfactory distribution among businesses of different sizes and individuals of different income levels. We took a cross section sample of 20 loans to develop the following tables.

#### ***Business Loan Sample Analysis***

Gross Business Revenues	# of Loans	% of Loans
Less than \$100,000	8	40
\$100,000 to \$499,000	9	45
\$500,000 to \$999,000	1	5
Greater than \$1,000,000	2	10
Total	20	100

### *Agricultural Loan Sample Analysis*

Gross Agricultural Revenues	# of Loans	% of Loans
Less than \$100,000	9	45
\$100,000 to \$499,000	10	50
\$500,000 to \$999,000	1	5
Greater than \$1,000,000	0	0
Total	20	100

### *Consumer Residential Loan Sample Analysis*

Income Levels	# of Loans	% of Loans	% Population of Assessment Area
Low	1	5	27
Moderate	5	25	21
Middle	8	40	25
Upper	6	30	27
Total	20	100	100

The variance between low- income borrowers and the number of loans made is mitigated by the large supply of affordable housing in the assessment area. Average rent for a two bedroom apartment in Riverton and surrounding areas is \$348, while the average three bedroom home rents for \$468 (Wyoming Cost of Living Index 12/99). In addition, the bank's mobile home loan products provide an additional option for low- and moderate- income borrowers. The bank has originated 4 mobile home loans in the past 12 months.

### ***Lending in Assessment Area***

WNB makes a majority of its loans within its assessment area. We assessed in/out of area lending patterns using standard ZIP codes. By number of loans, 94.5% of the bank's loans are extended to borrowers located within the bank's assessment area. Using total dollars, 87.1% of the banks loans are extended inside the assessment area.

### ***Geographic Distribution of Loans***

The bank's assessment area contains 4 moderate-income and 7 middle-income BNAs. We assessed the bank's geographic distribution using the samples of 1-4 family residential real estate loans and small business loans.

The distribution of commercial loans to borrowers in moderate-income areas, while lower, is

roughly equivalent to the percentage of moderate-income BNAs. We consider this distribution to be reasonable.

Income Designation of BNA	% of Total BNAs	% Assessment Area Pop.	# of Loans Originations	% Loan Originations
Low	0	0	0	0
Moderate	36	38	4	28
Middle	64	62	10	71
Upper	0		0	0
Total	100	100	18	100

\* Original sample size was 20. However, some addresses were identified as P.O. Boxes. We did not include these in the sample.

The distribution of 1-4 family residential real estate loans to borrowers in moderate-income areas approximates the percentage of the assessment area population and is reasonable.

Income Designation of BNA	% of Total BNAs	% Assessment Area Pop.	# of Loans Originations	% Loan Originations
Low	0	0	0	0
Moderate	35	38	6	33
Middle	65	62	12	67
Upper	0		0	0
Total	100	100	18	100

### ***Record of Complaints and Compliance with Anti-discrimination Laws***

There have been no complaints about the bank's CRA performance from the public since the bank opened.

We reviewed the bank's compliance with the Equal Credit opportunity Act and the Fair Housing Act. We did not find any violations of the substantive provisions of anti-discrimination laws and regulations.