



Public Disclosure

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Community Reinvestment Act Performance Evaluation

Community First National Bank - Wyoming
Charter Number: 23283

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Cheyenne, Wyoming 82001

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NOTE: This evaluation is not, and should not 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.

Table of Contents

General Information	1
Definitions and Common Abbreviations	2
Overall CRA Rating	5
Description of Institution.	6
Scope of Evaluation	7
Fair Lending Review	8
Conclusions with Respect to Performance Tests	9
Lending Test	9
Investment Test	15
Service Test	16
Appendix A: Scope of the Examination	A-1
Appendix B: Market Profiles for Full-Scope Areas	B-1
Appendix C: Standardized Tables	C-1

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 CRA performance of **Community First National Bank - Wyoming** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **September 30, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions provide a general understanding of the terms, and may not be a strict legal definition.

Affiliate - Any company that controls, is controlled by, or is under common control by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Assessment Area (AA) - geographic area as delineated by a bank within which the OCC evaluates the bank's record of helping to meet the credit needs. Used interchangeably with community.

Block Numbering Area (BNA) - Statistical subdivisions of counties in nonmetropolitan areas in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogeneous populations. A CT has defined boundaries per decennial census and an average population of 4,000.

Community Development (CD) - Affordable 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.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consolidated Metropolitan Statistical Area (CMSA) - Area defined by the Director of the United States Office of Management and Budget. A CMSA consists of an area with a population of more than one million.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area 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 an MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and its disposition (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Limited-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every 10 years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities, that have a high degree of interaction.

Middle Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate Income - Income levels that are at least 50% and less than 80% of the MFI.

Primary Metropolitan Statistical Area (PMSA) - Area defined by the Director of the United States Office of Management and Budget. A PMSA is a component of a CMSA.

Small Business Loans - Loans with an original amount of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholder's equity, perpetual preferred shareholder's equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table shows the performance level of **Community First National Bank - Wyoming** with respect to the Lending, Investment, and Service tests.

PERFORMANCE LEVELS	Community First National Bank - Wyoming Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

(*) Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors supporting the institution’s rating are:

- p An adequate volume of lending characterized by good geographic distribution, good borrower distribution, and good concentration within the assessment areas.
- p An excellent level of community development loans that is responsive to the need for affordable housing in all assessment areas.
- p A good level of investments, grants, and donations that are responsive to important community needs in all assessment areas.
- p An overall adequate variety and distribution of services in the assessment areas, augmented by some community development services provided in the Non-MSA assessment area.

Description of Institution

Community First National Bank - Wyoming is a wholly owned subsidiary of Community First Bankshares, Inc.(CFBX), a \$6.3 billion bank holding company headquartered in Fargo, North Dakota. CFBX operates primarily as an interstate bank holding company with banking subsidiaries in twelve Midwestern and Western states. Those are Arizona, California, Colorado, Iowa, Minnesota, Nebraska, New Mexico, North Dakota, South Dakota, Utah, Wisconsin, and Wyoming. The banking subsidiaries of CFBX offer a full range of financial services, but focus on traditional community banking. CFBX has several nonbank subsidiaries that provide services to affiliates or the public in the areas of data processing, lease finance, insurance, and tax management.

The bank was acquired by CFBX in July 1997 and its name was changed to Community First National Bank - Wyoming (CFNB). CFNB is headquartered in Cheyenne, Wyoming, and is the second largest bank in the state in terms of total deposits. It operates 28 branches and 35 ATMs located throughout most of the state. CFNB has facilities in 18 of the 23 counties in the state. The bank offers deposit products, loan products, general banking services, community development services, and trust services to residents in its assessment areas. Affiliated corporations offer a variety of insurance products through the bank's offices. And an unaffiliated corporation offers retail non-deposit investment products through the bank's offices.

There are no financial or legal impediments that prevent the bank from serving its assessment areas. As of September 30, 1999, CFNB reported total assets of \$1.1 billion, total deposits of \$804 million, net Tier 1 Capital of \$90 million, and year-to-date net income of \$10 million. The bank reported \$517 million of gross loans and leases, with 40% in real estate loans, 31% in commercial loans, 23% in consumer loans, 5% in agricultural loans, and 1% in other loans and leases.

For purposes of this evaluation, only the loans, investments, and services generated by CFNB were considered. None of the activities of CFNB's affiliates contributed to the bank's CRA performance.

Scope of the Evaluation

Evaluation Period/Products Reviewed

Due to the change in control and the need to allow time for systems integration, this evaluation period does not begin at the date of the last CRA examination of the bank. Rather, this evaluation assesses the bank's performance from January 1, 1998 through December 31, 1999. The Investment and Service Tests consider performance information for the entire period. The Lending Test considers information from January 1, 1998 through June 30, 1999. Home purchase loans, home improvement loans, home refinance loans, small business loans, small farm loans, and community development loans were reviewed in conjunction with the Lending Test.

Data Integrity

In order to determine the integrity of the data used in evaluating the bank's CRA performance, we reviewed samples of CFNB's publicly reported loan information (HMDA, small business, and small farm loans). We also reviewed all community development loans, investments, and services. During this evaluation period, we performed two data integrity reviews. The first review found significant errors in critical data fields for CFNB's reported loan information. Management corrected the errors and we performed a second review during this CRA examination to test the effectiveness of the corrective action. Our second review found both the HMDA and CRA data to be substantially accurate. The analysis and conclusions in this Performance Evaluation are based on the corrected data provided during the examination. However, the publicly reported data for 1998 (both the HMDA and CRA loan data) contains significant errors and it is too late to correct the previously reported public information.

Material errors were found in the non-public information provided to examiners regarding qualified investments and community development loans and services. Management was able to correct the errors during the examination and that allowed us to use the data for this evaluation.

Selection of Areas for Full-Scope Review

The bank has only three assessment areas. We performed full scope reviews of all of them. See the Scope of Examination table in Appendix A for more information.

Ratings

CFNB's overall rating is based on its performance in its three assessment areas. We weighted the performance information for the three assessment areas equally. The two MSA areas have significant differences between them such that they both should be addressed, and the Non-MSA area comprises such a large geographic area that it should carry equal weight in the evaluation of CRA performance.

Other

To assist our development of a performance context and to help determine credit needs, we reviewed summaries of 40 recent community contacts performed by bank and thrift regulators. These contacts were with representatives of government organizations, community groups, and businesses. We also performed three community contacts with similar groups during this examination, two in Cheyenne and one in Casper. The community contacts identified affordable housing and small business as the most pressing credit needs in each of the assessment areas. Additionally, Native Americans expressed the need for banking services and jobs training.

Fair Lending Review

We tested for illegal discrimination by reviewing a sample of approved conventional home purchase loans made by CFNB in 1998. We compared the rates, terms, and conditions of credit for a group of Hispanic borrowers against the rates, terms, and conditions of credit for a similarly situated group of White borrowers. We reviewed written policies. We also interviewed bank personnel about credit underwriting policies, practices, and procedures. No violations of the substantive provisions of the antidiscrimination laws and regulations were identified in this review.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated High Satisfactory. Based on full-scope reviews of CFNB's three assessment areas, the bank's performance in the Non-MSA is good; in the Cheyenne and Casper MSAs, performance is adequate. The good to excellent geographic and borrower distribution of small business and small farm loans played a key role in the bank's overall lending performance. It should be noted that the bank's primary business focus is small business lending. Further, the Non-MSA assessment area carries the most weight because it is the largest assessment area based on volume of deposits and loans.

Lending Activity

Please see Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending volume is adequate. Lending volumes are in line with the bank's business strategy which emphasizes commercial lending. The volume of small business lending is stronger than the volume of home mortgage lending in most of the assessment areas. CFNB originated 837 home mortgage loans, 1,157 small business loans, and 572 small farm loans in all its assessment areas.

While home mortgage lending volume is good in the bank's largest assessment area (the Non-MSA), it is weak in the Cheyenne MSA and the Casper MSA. CFNB originated 84% of all its loans in the Non-MSA assessment area. This compares very favorably with 71% of the deposits which it derived from this assessment area. However, the bank's lending is not as strong in the Cheyenne MSA. The bank generated 19% of its deposits from the Cheyenne MSA but originated only 12% of its loans in this assessment area. The weakest lending level is in the Casper MSA where the bank generated 10% of its deposit base but originated only 4% of its loans. A review of the 1998 HMDA market share data indicates market share correlates with the above. The bank has a good market share for home mortgage loan originations in the Non-MSA assessment area. Market share is adequate for the Cheyenne MSA but poor for Casper MSA.

The volume of small business lending in all three assessment areas is good. Market share data indicates the bank is one of the top five small business lenders in all three assessment areas. Volume of lending is also in line with the deposits derived from each of the assessment areas.

The volume of small farm lending in the Non-MSA and Cheyenne MSA is excellent. The bank is the second largest farm lender in these assessment areas with almost one-third of the market. The bank has an adequate volume of small farm loans in the Casper MSA.

Distribution of Loans by Income Level of the Geography

We did not note any conspicuous gaps in the bank's lending patterns for the assessment areas. There were no clusters of low- or moderate-income geographies in any of the assessment areas where the bank either did not originate home mortgage loans or small business loans. The bank made both home mortgage loans and small business loans in every geography in the Cheyenne MSA with the exception of one geography where the air force base is located. CFNB originated home mortgage loans in every LMI geography in the Non-MSA assessment area, and small business loans in every LMI geography with the exception of one low-income geography which has no businesses located there. The highest number of geographies where the bank did not make home mortgage loans is in the Casper MSA. However, the lack of home mortgage loans is not concentrated in LMI geographies; there are a number of middle-income geographies with no home mortgage loans as well. The bank originated small business loans in every low- and moderate-income geography in the Casper MSA.

Small Business Loans

Please see Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The overall geographic distribution of small business loans in all assessment areas is good. The distribution of loans in low- and moderate-income geographies in all the assessment areas compares favorably with the percentage of small businesses located in these geographies. The distribution of small business loans in low- and moderate-income geographies in the Non-MSA is good. In the Casper MSA, distribution is excellent for loans in moderate-income geographies, with the percentage of small business loans substantially exceeding the percentage of small businesses located in moderate-income geographies. Within low-income tracts in the Casper MSA, the bank's performance is also very strong. The percentage of loans made by CFNB nearly matches the

percentage of businesses located there. In the Cheyenne MSA, small business loan distribution is adequate.

The bank's market share performance for small business lending in 1998 reinforces the conclusion of good geographic distribution for this product line. CFNB's market share of small business loans made in low- and moderate-income geographies in all assessment areas is substantially close to, or exceeds, its overall market share. In both the Casper and Non-MSA assessment areas, the bank's market share of small business loans made in low-income geographies is actually higher than its overall market share. This indicates a good focus on making loans in those geographies most in need of the stabilizing and revitalizing effects that result from the infusion of capital.

Small Farm Loans

Please see Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations.

The overall geographic distribution of small farm loans in low- and moderate-income geographies is excellent. The percentage of small farm loans originated in low- and moderate-income geographies in all assessment areas substantially exceeds the percentage of small farms in these census tracts, with the exception of small farm loans in moderate-income geographies in the Casper MSA. CFNB made only two small farm loans in this assessment area, and both were originated in low-income geographies.

Home Mortgage Loans

Please see Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

Overall, geographic distribution of home mortgage loans in low- and moderate-income geographies is poor. This is based primarily on the overall poor distribution of loans for most home mortgage loan products in low- and moderate-income geographies. Distribution of loans in LMI geographies is mixed with good efforts to originate home improvement loans in low-income geographies in the Non-MSA assessment area, good efforts to originate home improvement loans in moderate-income geographies in the Cheyenne MSA, and adequate efforts to originate home improvement loans in moderate-income geographies in the Casper MSA. The bank's efforts to originate all types of home mortgage loans in moderate-income geographies in the Non-MSA assessment area

are adequate. However, for a majority of the home mortgage loan product in all assessment areas, the distribution in both low- and moderate-income geographies is poor.

Geographic distribution of home mortgage loans in low-income geographies is poor, with the exception of home improvement loans. The Cheyenne MSA has no low-income geographies, so our conclusions are based only on the Non-MSA and Casper MSA assessment areas. The data reflects poor distribution of home purchase and refinance loans in low-income geographies in the Non-MSA assessment area, and good distribution of home improvement loans. Distribution of all types of home mortgage loans in low-income geographies in the Casper MSA is poor. CFNB made no home mortgage loans in low-income geographies in this assessment area during the review period.

Geographic distribution of home mortgage loans in moderate-income geographies is adequate. In the Non-MSA assessment area, the percentage of all types of home mortgage loans originated in moderate-income geographies compares adequately to demographics. In the Cheyenne MSA, the bank's lending of home improvement loans in moderate-income geographies is good, but poor for home purchase and refinance loans. In the Casper MSA, the bank's lending in moderate-income geographies is adequate for home improvement loans, but poor for home purchase and refinance loans. Please note that Table 3 indicates the bank made 100% of its home improvement loans in moderate-income geographies; however, this represents only one loan.

Market share data indicates the bank substantially meets or exceeds its overall market share for all home mortgage loan products in the Non-MSA and Cheyenne MSA, with the exception of home refinance loans in low-income geographies in the Non-MSA assessment area. The bank has no market share for any type of home mortgage loan product in the Casper MSA.

Distribution of Loans by Income Level of the Borrower

Small Business Loans

Please see Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

Distribution of small business loans to business with gross annual revenues of \$1 million or less is excellent. The percentage of small business loans the bank originated to businesses of this size exceeds the percentage of small businesses with gross annual revenues of \$1 million or less in all assessment areas. Further, CFNB also exceeds the market in all assessment areas for the percentage of loans extended to small businesses.

The market share data for 1998 indicates market share of loans to small businesses with gross annual revenues of \$1 million or less far exceeds the bank's overall market share to businesses of all sizes in all assessment areas.

A substantial majority of the small business loans were for amounts of \$100,000 or less. Of the small business loans CFNB originated, 76% in the Cheyenne MSA, 86% in the Non-MSA assessment area, and 73% in the Casper MSA were in amounts of \$100,000 or less. The average loan size was \$68,000 in the Non-MSA assessment area, \$90,000 in the Cheyenne MSA, and \$120,000 in the Casper MSA.

Small Farm Loans

Please see Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

Distribution of farm loans to small farms with gross annual revenues of \$1 million or less is good. The percentage of loan originations to small farms substantially exceeds the percentage of small farms with gross annual revenues of \$1 million or less in the Non-MSA and Casper MSA. The percentage of small farm loan originations in the Cheyenne MSA is adequate. With the exception of the Cheyenne MSA, the percentage of loan originations to small farms compares favorably to the market.

Market share data indicates the bank's market share for loans to small farms with revenues of \$1 million or less substantially exceeds its overall market share in the Non-MSA and Cheyenne MSA. It slightly exceeds overall market share in the Casper MSA.

Home Mortgage Loans

Please see Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Overall distribution of home mortgage loans to low- and moderate-income borrowers is good. CFNB's efforts range from poor to excellent, but efforts are clearly stronger in the larger assessment areas. The bank's efforts to originate home mortgage loans to moderate-income borrowers in the Non-MSA and Cheyenne MSA are excellent. CFNB also made good efforts to originate home purchase and home improvement loans to low-

income borrowers in the Non-MSA assessment area and adequate efforts to originate home refinance loans to low-income borrowers in the Non-MSA. Efforts to originate home purchase and home improvement loans to low-income borrowers in the Cheyenne MSA are adequate, while efforts to originate home refinance loans are poor. The distribution of home mortgage lending to both low- and moderate-income borrowers in the Casper MSA is generally poor.

Distribution of home purchase loans to low-income borrowers is good in the Non-MSA and adequate in the Cheyenne MSA; the bank did not originate any loans to low-income borrowers in the Casper MSA. Distribution of home improvement loans to low-income borrowers is also good in the Non-MSA assessment area, and adequate in the Cheyenne and Casper MSAs. Distribution of home refinance loans is generally poor, with poor distribution in the Cheyenne and Casper MSAs and adequate distribution in the Non-MSA. However, refinance loans carry less weight in our distribution analysis, as these loans are not directly responsible for the acquisition or improvement of homes for borrowers in LMI geographies.

Distribution of home mortgage loans to moderate-income borrowers is excellent, with the exception of loans originated to moderate-income borrowers in the Casper MSA. The bank did not originate any home purchase or home improvement loans to moderate-income borrowers in the Casper MSA and very few home refinance loans.

The HMDA market share data for 1998 indicates the bank's market share to low- and moderate-income borrowers either meets or substantially exceeds its overall market share for all products in all census tracts in the Non-MSA and the Cheyenne MSA, with the exception of home refinance loans in the Cheyenne MSA. The bank has no market share for any HMDA product in the Casper MSA.

Product Innovation and Flexibility

The bank made an adequate effort to provide flexible lending products to residents in its assessment areas. CFNB has a customary array of flexible products for consumer mortgage and commercial customers.

CFNB is an active SBA lender. It is in the SBA's Certified Lender Program and offers a variety of SBA loan products. SBA loan products are considered flexible because they enable the bank to make loans to borrowers who might otherwise not be creditworthy. Participation in SBA loan programs helped the bank achieve good geographic distribution of small business loans to LMI geographies, thus addressing the credit needs of small businesses in those geographies.

Additionally, the bank made loans under the Wyoming Community Development Authority's affordable home loan program. The program targets low- and moderate-

income, first time home buyers with down payment and interest rate concessions. These loans were included in the bank's HMDA report. Production information from this program was not available. The bank's participation in this program helps meet an important community need for affordable housing.

Lending Inside Versus Outside of the Assessment Areas

CFNB has a good focus on lending within its assessment areas. During the evaluation period, the bank originated 98% of the number and 97% of the dollar volume of its HMDA reportable loans within the assessment area. In addition, the bank originated 82% of the number and 77% of the dollar volume of its CRA reportable loans (small business and small farm) within the assessment area.

Community Development Lending

CFNB originated an excellent level of community development loans which are responsive to a significant community development need in its delineated communities. During the review period, CFNB originated five community development loans, which total \$6.5 million. This represents 7% of Tier 1 capital.

A majority of the loans, four totaling \$6.3 million, benefit the Non-MSA assessment area. This is significant because of the primarily rural nature of this assessment area. There are few opportunities to originate qualifying loans or investments that have a community development purpose in these rural areas. The bank made one other community development loan totaling \$167 thousand in the Casper assessment area. All of the loans provided funds for affordable multi-family housing projects. The loans provided either construction or rehabilitation funds for more than 50 affordable housing units for LMI individuals. By supplying credit for affordable housing, CFNB met one of the most important credit needs in its assessment areas.

INVESTMENT TEST

CFNB's performance under the investment test is rated High Satisfactory. Based on a full scope review of all three assessment areas, the bank's performance in each assessment area is good. The bank has a high level of qualified investments and grants, with a good distribution across all three assessments. The investments are very responsive to the credit and community development needs noted by community contacts.

Please see Table 12 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's level of qualified investments in all three assessment areas is good, particularly considering the limited opportunities in the assessment areas. Community contacts note that there are more opportunities for loans, rather than investments. CFNB has made good use of those investment opportunities that are available. During the evaluation period, the bank invested a total of \$3.2 million. This represents 3.7% of Tier 1 capital.

The bank's investments are very responsive to the community development needs of its assessment area. The bank's qualified community development investments consist, primarily, of two large investments. About 88% addresses affordable housing, which is one of the primary needs noted by community contacts. About 11% benefits small business loan needs, another significant need noted by community contacts. The investments include:

- b A \$2.9 million equity investment in a multi-bank community development corporation (CDC). The purpose of the CDC is to invest in mortgage backed securities issued by the Federal Home Loan Mortgage Company to finance loans which will provide affordable housing for LMI individuals. This includes both owner occupied and rental housing. The investment benefits all three assessment areas because the underlying mortgage loans finance residential properties located throughout the state.
- b A \$365 thousand investment in an industrial development corporation. The purpose of the corporation is to serve as a non-bank lender, by leveraging investments and using federal and state loan programs, to assist Wyoming's small businesses. This investment benefits the Casper MSA assessment area.

The remaining investments consist of 32 contributions and grants which are distributed throughout all three assessment areas. A majority of these helped provide services for LMI individuals.

In addition, the bank invested \$4.4 million in mortgage backed securities. The securities primarily benefit LMI persons by providing affordable multi-family housing in adjacent states. This investment is not noted in Table 12 because none of the underlying loans benefitted the bank's assessment area. Therefore, the \$4.4 million was not considered in determining the bank's overall performance. However, the investment is responsive to the affordable housing needs of LMI individuals outside the bank's assessment area.

SERVICE TEST

Please refer to Table 13 in Appendix C for the facts and data used in this analysis.

Retail Banking Services

CFNB provides an adequate level of services to its three assessment areas. The bank offers a standard assortment of services at all of its branches in all three of its assessment areas. These include deposit accounts, loan products, trust services, and other traditional banking services. Most of the branches have drive-up facilities that are open extended hours, thereby increasing accessibility. Toll-free telephone banking and proprietary ATMs also give customers increased access to services, primarily pertaining to their deposit accounts. Affiliated and unaffiliated corporations provide other services through CFNB's offices, however, these are not considered part of the bank's performance. In general, the traditional banking services offered by CFNB are not specifically targeted towards the needs of LMI persons.

The bank's business hours and alternative delivery system provide convenient access to its services in all of the assessment areas. Lobby hours, drive-up hours, and walk-up hours do vary some between branches. However, the variances do not arbitrarily inconvenience low- and moderate-income neighborhoods.

The bank has not opened, closed, or moved any branches in the last two years. The distribution of CFNB's branch and ATM delivery system is considered good in all three assessment areas. The distribution of CFNB's physical facilities by income level of census tract correlates well with the distribution of the population by income level of census tract. This means that the bank has situated its facilities in a way that provides equal access to residents of LMI geographies.

Community Development Services

Officers and employees of the bank produced an adequate level of community development services during this evaluation period. All of the services benefited the Non-MSA assessment area, which is the largest geographically, and which is also where the bank has its greatest concentration of deposits and loans.

The community development services were provided to nonprofit groups, a Native American tribe, and individuals in the assessment area. Free business checking accounts were given to the Northern Arapahoe Indian Tribe to facilitate its funds management function. And mentoring was provided to Native American students in an

employer training program. A majority of the tribal members are LMI persons. Home buyer counseling was given to LMI persons. Technical assistance was given to various nonprofit groups in the areas of mortgage lending, affordable housing, and conducting business in Indian country. These services met important community service needs in the areas of affordable housing, education, and banking services. They facilitated the provision of financial services to the assessment area by equipping groups with the knowledge to develop and implement affordable housing programs, by giving individuals the skills needed to obtain jobs, and by informing the public about affordable home loan programs.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, if any, and products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope").

Time Period Reviewed	Lending Test: January 1, 1998, through June 30, 1999 Investment Test: January 1, 1998, through December 31, 1999 Service Test: January 1, 1998, through December 31, 1999	
Financial Institution	Products Reviewed	
Community First National Bank - Wyoming (CFNB) Cheyenne, Wyoming	Small Business Loans, HMDA Loans, Small Farm Loans, Community Development Loans, Community Development Investments, Retail Banking Services and Community Development Services	
Affiliates(s)	Affiliate Relationship	Products Reviewed
None reviewed	NA	NA

List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cheyenne MSA #1580	Full-Scope	NA
Casper MSA #1350	Full-Scope	NA
Non-MSA	Full-Scope	NA

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Cheyenne MSA #1580 B-2
Casper MSA #1350. B-3
Non-MSA Areas B-4

Cheyenne Assessment Area

Demographic Information For Full-Scope Area: Cheyenne MSA #1580						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	18	0	39	39	22	0
Population by Geography	73,142	0	35	44	21	0
Owner-Occupied Housing by Geography	18,407	0	29	47	24	0
Businesses by Geography*	2,750	0	55	33	12	0
Farms by Geography*	89	0	44	21	35	0
Family Distribution by Income Level	20,127	19	19	24	38	0
Distribution of Low- and Moderate-Income families throughout AA Geographies	7,616	0	50	38	12	0
Median Family Income	= \$32,587	Median Housing Value		= \$69,831		
HUD Adjusted Median Family Income for 1999	= \$43,800	Unemployment Rate (1999)		= 3.00%		
Households Below the Poverty Level	= 11.00%					

Source: 1990 U.S. Census and 1999 HUD updated MFI.

*1998 Dun & Bradstreet Business Demographic Data.

The Cheyenne MSA consists of Laramie County and is the largest MSA in Wyoming by population. The bank’s assessment area consists of the entire MSA. Communities located in the assessment area include: Albin, Burns, Cheyenne, and Pine Bluffs. Cheyenne is the state capital. This MSA does not contain any low-income census tracts. The assessment area meets the requirement of the regulation and does not arbitrarily exclude any moderate-income geographies.

CFNB faces competition in this assessment area from branches of two other regional banks, seven community banks, a thrift, and eleven credit unions. In terms of deposit market share, CFNB is the largest bank in the MSA with 24% of bank deposits according to the June 30, 1999 FDIC Deposit Market Share Report. However, the two other regional banks are larger than CFNB on a statewide basis, thus possessing the resources to maintain significant marketing pressure on CFNB and other financial institutions in the MSA.

Federal, State, and local government employment dominates the local economy, with Warren Air Force Base a significant factor. Behind government activities, major economic sectors are other services and retail trade. In addition, tourism plays a supporting role in the local economy. The annual Cheyenne Frontier Days celebration hosts one of the largest rodeos in the nation. Also, major interstate highways and railroad lines pass through Cheyenne. Because government expenditures are not as cyclical as other sectors of the economy, the Cheyenne MSA is not as subject to severe economic fluctuations as other parts of the state.

Information recorded by the Bureau of Labor Statistics shows that unemployment declined from an average rate of 3.90% in 1997 to 3.0% as of October 1999. This is significantly below the national average. The Wyoming Housing and Demographic Data publication describes the housing market as improving recently, with rising values, increasing rents, and less rental units available. This information indicates the local economy is stable and improving.

Casper Assessment Area

Demographic Information For Full-Scope Area: Casper MSA #1350						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	19	10	21	53	16	0
Population by Geography	61,226	5	12	49	34	0
Owner-Occupied Housing by Geography	16,416	4	13	50	33	0
Businesses by Geography*	3,229	28	15	38	19	0
Farms by Geography*	69	10	15	39	36	0
Family Distribution by Income Level	16,799	4	13	49	34	0
Distribution of Low- and Moderate-Income families throughout AA Geographies	6,395	9	18	50	23	0
Median Family Income	= \$32,469	Median Housing Value		= \$51,236		
HUD Adjusted Median Family Income for 1999	= \$41,200	Unemployment Rate (1999)		= 4.50%		
Households Below the Poverty Level	= 12.00%					

Source: 1990 U.S. Census and 1999 HUD updated MFI.

*1998 Dun & Bradstreet Business Demographic Data.

The Casper MSA consists of Natrona County and is the second largest MSA in Wyoming by population. The bank's assessment area consists of the entire MSA. Communities located in the assessment area include: Alcova, Bar Nunn, Casper, Edgerton, Midwest, and Mills. The assessment area meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

CFNB faces competition in the assessment area from branches of three other regional banks, three community banks, and nine credit unions. In terms of deposit market share, CFNB is the fourth largest bank in the MSA with 6% of bank deposits according to the June 30, 1999 FDIC Deposit Market Share Report. The three banks with deposit market shares larger than CFNB together hold 91% of the deposits in the MSA. This creates a challenging competitive environment for the bank.

The largest employment sectors are services, retail trade, energy exploration/development, and health care. Information recorded by the Bureau of Labor Statistics shows that unemployment declined from an average rate of 5.90% in 1997 to 4.50% as of October 1999. Despite this reduction, the rate is still significantly above the national average. The Wyoming Housing and Demographic Data publication describes the housing market as stable, with rents flat or declining. This publication also states that employment, per capita personal income, and population growth have remained well below the national average in recent years. This information and input from community contacts indicates the local economy is stable and somewhat stagnant.

Non-MSA Assessment Area

Demographic Information For Full-Scope Area: Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	109	3	17	58	19	3
Population by Geography	285,929	1	14	59	25	1
Owner-Occupied Housing by Geography	70,494	1	13	62	24	0
Businesses by Geography*	13,144	1	16	67	16	0
Farms by Geography*	583	1	15	74	10	0
Family Distribution by Income Level	74,936	19	17	24	40	0
Distribution of Low- and Moderate-Income families throughout AA Geographies	6,395	2	21	62	15	0
Median Family Income	= \$32,096	Median Housing Value		= \$64,550		
HUD Adjusted Median Family Income for 1999	= \$41,900	Unemployment Rate		= 2.81%		
Households Below the Poverty Level	= 13.00%					

Source: 1990 U.S. Census and 1999 HUD updated MFI.

*1998 Dun & Bradstreet Business Demographic Data.

The Non-MSA assessment area includes the majority of Wyoming, and comprises a large geographic area. The following counties are in the area: Albany, Campbell, Carbon, Converse, Fremont, Goshen, Lincoln, Niobrara, Park, Platte, Sheridan, Sublett, Sweetwater, Teton, Uinta, and Washakie. Larger communities in this assessment area are: Big Piney, Cody, Douglas, Evanston, Gillette, Green River, Jackson, Kemmerer, Lander, Laramie, Lusk, Meeteetse, Powell, Rawlins, Riverton, Rock Springs, Saratoga, Sheridan, Torrington, Wheatland, and Worland. The assessment area meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts.

Wyoming counties not in the bank’s assessment areas are Big Horn, Crook, Hot Springs, Johnson, and Weston. These were not included because the bank does not have facilities in

them and does not derive deposits from them. Also, a number of financial service providers already serve these counties.

The most significant feature of this rural assessment area is the large amount of land owned by federal and state government entities, amounting to over half of the state. The dominant features of the western portion of the state are mountain ranges, national parks, wilderness areas, national forests, and a large American Indian Reservation. The economy of western Wyoming is closely tied to tourism, ranching, and real estate development.

The central and western portions of the state are dependent on mineral extraction, agriculture, and tourism, listed by order of importance. Wyoming is one of the leading states in the nation in the production of coal, oil, natural gas, bentonite, trona, wool, barley, sugar beets, and dry beans, with natural gas exploration and development on the increase.

Generally, the rural part of the state is experiencing slow growth. There are a few pockets of high growth, with associated real estate activity. The communities of Cody, Dubois, Jackson, and Sheridan are experiencing an influx of people from out-of-state. This has driven up real estate prices in those communities, located in the northern and western parts of the state. Some newcomers have purchased operating ranches and converted them to vacation retreats, adversely affecting the ranch supply/retail sectors in some communities.

CFNB faces competition from a variety of banks, thrifts, credit unions, and other financial service providers. In 1998, 204 financial service providers reported HMDA loan activity in this assessment area and 61 reported small business or small loan activity.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those

geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

STANDARDIZED TABLES

Table 1. Lending Volume

LENDING VOLUME													State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	% of Total CFNB Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
Cheyenne MSA	19%	114	\$8,980	160	\$18,431	25	\$1,432	0	\$0	299	\$28,843	12%				
Casper MSA	10%	27	\$2,547	89	\$9,871	2	\$55	1	\$167	119	\$12,640	4%				
Non-MSA	71%	696	\$39,969	908	\$54,620	545	\$22,030	4	\$6,342	2,153	\$122,961	84%				

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans					
	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA**	NA	NA	29%	10%	47%	57%	24%	33%	18	.79	0	1.63	.61	.48	30	12%				
Casper MSA	4%	0%	13%	0%	50%	0%	33%	100%	0	0	0	0	0	4	1%					
Non-MSA	1%	0%	13%	10%	62%	68%	24%	22%	12	2.56	0	2.30	3.68	1.08	219	87%				

(*) Based on 1998 Aggregate HMDA Data only.

(**) There are no low-income geographies in the Cheyenne MSA.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans					
	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA**	NA	NA	29%	32%	47%	42%	24%	26%	13	1.68	0.00	2.70	1.64	1.00	19	16%				
Casper MSA	4%	0%	13%	100%	50%	0%	33%	0%	0	0	0	0	0	0	1	1%				
Non-MSA	1%	1%	13%	10%	62%	60%	24%	29%	5	8.64	50.00	10.17	10.40	5.30	98	83%				

(*) Based on 1998 Aggregate HMDA Data only.

(**) There are no low-income geographies in the Cheyenne MSA.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																
State: Wyoming																
Evaluation Period: January 1, 1998 to June 30, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans	% Owner Occ Units	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Cheyenne MSA**	NA	NA	29%	13%	47%	42%	24%	45%	61	.15	0	.18	.06	.26	64	14%
Casper MSA	4%	0%	13%	0%	50%	32%	33%	68%	0	0	0	0	0	22	5%	
Non-MSA	1%	0%	13%	9%	62%	69%	24%	22%	16	1.52	0	2.51	1.86	.79	373	81%

(*) Based on 1998 Aggregate HMDA Data only.

(**) There are no low-income geographies in the Cheyenne MSA.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans					
	% of Businesses	%CFNB Loans	% of Businesses	%CFNB Loans	% of Businesses	%CFNB Loans	% of Businesses	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA**	NA	NA	53%	41%	33%	38%	14%	21%	20	26.87	0.00	24.15	34.01	21.45	160	14%				
Casper MSA	27%	25%	14%	21%	39%	29%	20%	25%	5	7.98	9.95	6.09	5.28	13.07	89	8%				
Non-MSA	1%	1%	16%	15%	67%	66%	16%	18%	2	19.62	20.00	16.46	20.23	13.65	908	78%				

(*) Based on 1998 Aggregate Small Business Data only.

(**) There are no low-income geographies in the Cheyenne MSA.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans					
	% of Farms	%CFNB Loans	% of Farms	%CFNB Loans	% of Farms	%CFNB Loans	% of Farms	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA**	NA	NA	48%	60%	18%	4%	34%	36%	2	30	0	33	33	24	25	4%				
Casper MSA	12%	100%	12%	0%	37%	0%	39%	0%	3	4	25	0	0	0	2	13%				
Non-MSA	1%	2%	15%	21%	74%	71%	10%	6%	2	30	25	18	35	9	545	83%				

(*) Based on 1998 Aggregate Small Farm Data only.

(**) There are no low-income geographies in the Cheyenne MSA.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999			
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank ***	Market Share by Borrower Income**					Total Home Purchase Loans							
	% of Families	%CFNB Loans*	% of Families	%CFNB Loans*	% of Families	%CFNB Loans*	% of Families	%CFNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total						
Full-Scope:																						
Cheyenne MSA**	19%	10%	19%	40%	24%	23%	38%	27%	26	.79	3.52	1.29	.51	.34	30	12%						
Casper MSA	20%	0%	18%	0%	24%	25%	37%	75%	0	0	0	0	0	0	4	1%						
Non-MSA	19%	13%	17%	23%	24%	27%	40%	36%	12	2.56	7.27	2.86	1.98	2.81	219	87%						

(*) As a percentage of loans with borrower income information available. No information was available for 1% of loans originated by CFNB in the Non-MSA Assessment Area.

(**) There are no low-income geographies in the Cheyenne MSA.

(***) Based on 1998 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Improvement Loans					
	% of Families	%CFNB Loans	% of Families	%CFNB Loans	% of Families	%CFNB Loans	% of Families	%CFNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA	19%	11%	19%	37%	24%	26%	38%	26%	13	1.68	0	3.13	2.70	.66	19	16%				
Casper MSA	20%	100%	18%	0%	24%	0%	37%	0%	0	0	0	0	0	0	1	1%				
Non-MSA	19%	14%	17%	24%	24%	26%	40%	36%	5	8.64	15.52	12.61	5.96	7.05	97	83%				

(*) Based on 1998 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																	State: Wyoming		Evaluation Period: January 1, 1998 to June 30, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans					
	% of Families	% CFNB Loans*	% of Families	%CFNB Loans*	% of Families	%CFNB Loans*	% of Families	%CFNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Cheyenne MSA	19%	3%	19%	23%	24%	10%	38%	61%	61	.15	0	0	0	.30	64	14%				
Casper MSA	20%	4%	18%	9%	24%	23%	37%	64%	0	0	0	0	0	22	5%					
Non-MSA	19%	8%	17%	21%	24%	24%	40%	45%	16	1.52	7.8 1	3.61	1.85	1.11	373	81%				

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated by CFNB in the Cheyenne MSA and 2% of loans originated in the Non-MSA Assessment Area.

(**) Based on 1998 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS			State: Wyoming			Evaluation Period: January 1, 1998 to June 30, 1999					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share***		Total Small Business Loans		
	% of Businesses*	% CFNB Loans	% Market Loans**	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Cheyenne MSA	70%	74%	61%	76%	12%	12%	26.81	39.46	160	14%	\$90
Casper MSA	73%	74%	67%	73%	18%	9%	7.98	11.91	89	8%	\$120
Non-MSA	74%	90%	85%	86%	10%	4%	19.62	22.70	908	78%	\$68

(*) As a percentage of businesses with known revenues.

(**) The market consists of all other Small Business reporters in CFNB's assessment area and is based on 1998 Aggregate Small Business Data only.

(***) Based on 1998 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM			State: Wyoming			Evaluation Period: January 1, 1998 to June 30, 1999					
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share***		Total Small Farm Loans		
	% of Farms*	%CFNB Loans	% Market Loans**	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Cheyenne MSA	93%	76%	88%	88%	4%	8%	26.56	33.33	25	4%	\$77
Casper MSA	94%	100%	96%	100%	0%	0%	4.17	4.35	2	1%	\$30
Non-MSA	94%	99%	99%	92%	7%	1%	29.56	29.86	545	95%	\$44

(*) As a percentage of farms with known revenues.

(**) The market consists of all other Small Farm reporters in CFNB's assessment area and is based on 1998 Aggregate Small Farm Data only.

(***) Based on 1998 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
			State: Wyoming			Evaluation Period: January 1, 1998 to December 31, 1999			
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Cheyenne MSA	0	\$0	0%	9	\$953	100%	9	\$953	29%
Casper MSA	0	\$0	0%	2	\$1,315	100%	2	\$1,315	41%
Non-MSA	0	\$0	0%	21	\$973	100%	21	\$973	30%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: Wyoming				Evaluation Period: January 1, 1998 to December 31, 1999									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total CFNB Deposits	# of CFNB Branches	% of Total CFNB Branches	Location of Branches by Income of Geographies				# of CFNB ATMs	% of Total CFNB ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Cheyenne MSA**	19%	4	14%	0%	25%	50%	25%	11	31%	0%	9%	55%	36%	0%	35%	44%	21%
Casper MSA	10%	2	7%	50%	0%	0%	50%	3	9%	34%	0%	33%	33%	5%	12%	49%	34%
Non-MSA	71%	22	79%	0%	9%	77%	14%	21	60%	0%	5%	81%	14%	1%	14%	60%	25%

(*) The percentage of the population in the MSA/assessment area that resides in these geographies.

(**) There are no low-income geographies in this MSA.