



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

March 06, 2007

Community Reinvestment Act Performance Evaluation

**American National Bank
Charter Number: 15383**

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Denver, CO 80206**

Office of the Comptroller of the Currency

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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, 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.

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Overall CRA Rating

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

The following table indicates the performance level of **American National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	American National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory			
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

*The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall, ANB’s level of originated and purchased loans in its full-scope assessment areas (AAs) is **good**. Lending levels are consistent with the bank’s strategic focus and financial resources.
- ANB’s geographic distribution of home mortgage loans is excellent. In its full-scope Colorado AAs, it is excellent; and in its Wyoming full-scope AA, it is good.
- ANB’s distribution of home mortgage loans to borrowers of different income levels and to businesses of different sizes is good. In its full-scope Colorado AAs, it is adequate; and in its Wyoming full-scope AA, it is excellent.
- ANB provided an adequate level of community development loans in its Colorado and Wyoming AAs.
- ANB offered some flexible loan products to help meet the needs of its Colorado and Wyoming AAs.
- ANB demonstrated adequate performance in providing qualified community development investments and grants.
- Branch delivery systems provide excellent accessibility to individuals living in LMI geographies in the bank’s larger markets and reasonable accessibility in its smaller markets.

- ANB provided a high level of community development services in its full-scope AAs during the review period.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental 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 the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract 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 a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited 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, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten 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 Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5

million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

American National Bank (ANB) is a full-service financial institution headquartered in Denver, Colorado. As of December 31, 2006, ANB had total assets of almost \$1.9 billion and Tier One Capital of \$136 million.

ANB is a wholly owned subsidiary of Sturm Financial Group (SFG), which is headquartered in Denver, Colorado. As of December 31, 2006, SFG had total assets of \$2.1 billion. SFG owns 100 percent of ANB. Besides ANB, SFG operates Premier Bank in Kansas and Missouri. Within ANB, there is a wholly owned subsidiary, Community First Data Services (CFDS). CFDS provides mainframe processing and network services to all SFG banks and four non-SFG banks.

ANB offers a full range of credit products within its assessment areas (AAs) including commercial, real estate, and consumer loan products. However, the bank's primary business focus is commercial lending. Specifically, the bank focuses on making loans to small and mid-size businesses. Consumer products are incidental to ANB's business. The bank operates a mortgage loan department; however, in general credit decisions are made by outside lenders and therefore not reported on the bank's Home Mortgage Disclosure Act (HMDA) report. These loans are sold on the secondary market and are not reflected on the bank's balance sheet. In late 2005, ANB opened a wholesale division in the Colorado mortgage loan department. This included in-house underwriters where the credit decisions for ANB loans were made by ANB staff. The wholesale division of the department was dissolved second quarter 2006. The Colorado mortgage loan department still maintains one ANB underwriter on staff. And, the Wyoming mortgage loan department maintained an in-house underwriter throughout the evaluation period. All of the loans underwritten by the ANB underwriters are included on the bank's 2005 and 2006 HMDA LARs. By dollar amount, ANB's loan portfolio consists of the following types of credit: 42 percent construction and development, 15 percent commercial and industrial, 13 percent one- to four-family residential, 26 percent other, including multifamily and non-farm/non-residential real estate secured loans, 3 percent other consumer loans, and 1 percent agricultural loans.

ANB operates as an interstate bank with offices in Colorado and Wyoming. The current charter represents the consolidation of eight separate banking charters in these two states. The consolidation began in 2001 merging a few banks at a time. In February 2004, a final consolidation took place joining all 33 branches in Colorado and Wyoming into one bank – American National Bank. The final charters which were consolidated in February 2004 were Western National Bank in Colorado Springs, Colorado; Mesa National Bank in Grand Junction, Colorado; and American National Bank of Cheyenne, Wyoming. During the evaluation period, the bank closed two branches—one in Greeley, Colorado in September 2004, one in Grand Junction, Colorado in February 2006, and opened three—one in Grand Junction, Colorado, one in Avon, Colorado and a third in Gillette, Wyoming. In addition to the 33 branches, ANB operates 42 ATMs in Colorado and 21 in Wyoming. The bank has designated the following ten AAs.

Colorado

- Boulder MSA;
- Colorado Springs Metropolitan Statistical Area (MSA);

- Denver-Aurora MSA;
- Grand Junction MSA;
- Eagle, Garfield, and Pitkin Counties; and
- San Miguel County.

Wyoming

- Casper MSA;
- Cheyenne MSA;
- Albany County; and
- Northern Wyoming (Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties).

There are no known legal, financial, or other impediments that would hamper ANB's ability to help meet the credit needs of its AA. Prior to the consolidation, the charters received the following ratings: Western National Bank received a rating of "Satisfactory" under a large bank CRA examination performed as of January 3, 2004. American National Bank of Cheyenne received a "Satisfactory" rating under a small bank CRA examination performed as of May 4, 1998. Mesa National Bank received a "Satisfactory" rating under a small bank CRA examination performed as of July 20, 1998.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans and CRA loans (small loans to businesses) is from January 1, 2005, to December 31, 2006. We based market comparisons on 2006 Home Mortgage Disclosure Act (HMDA) and 2006 small business loan peer data. The evaluation period for community development loans, investments, and services is January 3, 2004, to March 25, 2007.

The CRA regulation also gives consideration to a bank's small loans to farms. We did not include an analysis of this loan product in the summary of the Lending Test because ANB made only 5 loans to farms during the evaluation period. Consequently, the data is not meaningful.

We also did not analyze multifamily loans as the bank reported only five loans. In addition, during the examination period, reporting requirements changed and banks are no longer required to report multifamily loans as a separate category.

Data Integrity

We tested the accuracy of the bank's publicly reported data for home mortgage loans and small loans to businesses as part of the CRA evaluation. HMDA and CRA loan data for 2005 and 2006 was found to be substantially accurate. We also reviewed community development loans, investments, and services submitted by ANB to ensure they meet the regulatory definition for community development. This evaluation considers only those loans, investments, and services that meet the definition and purpose of community development.

Selection of Areas for Full-Scope Review

We performed full-scope reviews in each state where ANB has offices. Our review included a full-scope review of two AAs in Colorado. These are the Colorado Springs MSA and the Denver-Aurora MSA which combined represent 61 percent of total deposits and 53 percent of the number of reportable loans in Colorado. The Colorado Springs MSA represents 36 percent of total deposits and 23 percent of the total number of reportable loans. The Denver-Aurora MSA represents 25 percent of total deposits and 30 percent of the total number of reportable loans. We also performed a full-scope review of the Cheyenne MSA which represents 43 percent of total deposits and 21 percent of total number of reportable loans in Wyoming. Accordingly, these are considered representative of ANB's overall CRA performance. Limited scope reviews were conducted in the remaining AAs. We also included the Greeley MSA in our limited scope review since the bank maintained a branch in this AA for part of the review period. As noted previously, the bank closed this branch in September 2004.

Ratings

The bank's overall rating is a blend of two state ratings. We placed slightly more weight in arriving at our overall conclusions on the state of Colorado since a majority of the bank's operations are in Colorado.

The state ratings, as well as the overall Lending, Investment, and Service Test ratings are based primarily on conclusions drawn on the AAs that received full-scope reviews, but were also influenced by performance in limited-scope areas. When determining the Lending Test conclusions by AA, ANB's small business lending was weighted more heavily because this is the bank's business focus. In addition, small business loans represent 56 percent of the total HMDA and CRA loans reported in 2005 and 2006. However, we did not ignore the impact of HMDA lending since this a significant need in the bank's AAs, and accordingly, we also placed some weight on HMDA lending. Small farm loans are so few in number that no weight was given to these in this evaluation. Within the bank's HMDA lending, home purchase, home improvement, and home refinance loans are weighted based on volume. We also gave consideration to qualitative factors such as complexity, innovation, responsiveness, and flexible lending programs. Community development lending is considered a neutral or positive impact to overall Lending Test ratings, based on volume, complexity, or community impact of the transactions.

The term "allocated Tier One Capital" is used to describe the representative portion of capital that is equal to the portion of deposits relative to total bank deposits in a specific AA. It is used only as a reference. The term is used in relation to ANB's qualified investments.

The Service Test analysis focuses on ANB's distribution of branches by income level of the geography. However, there were instances where a branch located in a middle- or upper-income census tract was actually on or near the border with a low- or moderate-income tract. Accordingly, our analysis considered the benefit these "bordering branches" provided to their respective communities. Changes in branch locations and community development services receive a lesser amount of weight in the overall conclusions of the Service Test. However, CD services, if significant, can have a positive impact on the overall Service Test ratings.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Colorado State Rating

CRA Rating for Colorado:

The lending test is rated: Low Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: Outstanding

The major factors that support this rating include:

- ANB's level of originated and purchased loans in its full-scope Colorado AAs is good; lending levels are consistent with the bank's strategic focus and financial resources.
- The geographic distribution of ANB's home mortgage loans is good; the geographic distribution of small loans to businesses is excellent.
- ANB's distribution of home mortgage loans to borrowers of different income levels and to businesses of different sizes is adequate.
- ANB offers a flexible loan product to help meet the credit needs of its Colorado Springs AA. The volume of loans made through this program, which focuses on providing financing for low- and moderate-income first time homebuyers, is low since the bank just became involved in this program in late 2006.
- ANB provided \$3.7 million in community development loans in its full-scope Colorado AAs which represents an adequate level of community development lending. This level of lending did not significantly impact the overall Lending Test rating.
- ANB demonstrated adequate performance in providing qualified community development investments and grants.
- Branch delivery systems provide excellent accessibility to individuals living in LMI geographies in its larger markets and reasonable accessibility in its smaller markets.
- ANB provided a very high level of community development services in its Colorado AAs during this review period.

Description of Institution's Operations in Colorado

Refer to the market profiles for the Colorado Springs and the Denver-Aurora MSAs in Appendix C for detailed demographics and other performance context information.

The majority of ANB's operations are in Colorado. ANB operates 25 branches and 42 ATMs in the state of Colorado. Based on dollar volume, Colorado operations account for 61 percent of the bank's loans and 78 percent of the bank's deposits.

The bank is a full service bank with six AAs in Colorado. ANB's major competitors in the Denver MSA are Colorado Capital Bank; Colorado Business Bank; Guaranty Bank; Colorado State Bank; Community Bank of Colorado; Horizon Bank, N. A.; U. S. Bank, N.A.; Wells Fargo Bank, N.A.; and Citywide Bank. Major competitors in the Colorado Springs MSA are Academy National Bank.; First Community Bank; Bank at Broadmoor; Peoples National Bank; Wells Fargo Bank, N.A.; Bank of America, N.A.; U. S. Bank, N.A.; J. P. Morgan/Chase, N.A; and ENT Credit Union (a very large credit union that provides significant competition for all the financial institutions in the AA.)

Scope of Evaluation in Colorado

The Colorado Springs MSA and Denver-Aurora MSA received full-scope reviews. The Boulder MSA, the Grand Junction MSA, the Greeley MSA, the Eagle, Garfield and Pitkin Counties non-MSA and the San Miguel County non-MSA received limited scope reviews.

We reviewed all of the most recent community contacts completed by the OCC during the last six months. These organizations either focus on providing affordable housing for LMI individuals or provide support for small businesses. Community contacts indicate the greatest needs in the Colorado AAs are for investments and loans to help provide affordable housing; affordable mortgage loans for LMI individuals and households; investments of grants to support organizations that promote small business development; and small business loan programs that provide adequate access to financing for LMI borrowers, including small start-up businesses.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Colorado is rated "Low Satisfactory". Based on full-scope reviews, the banks performance in the Colorado Springs MSA and the Denver-Aurora MSA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the "State of Colorado" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall, lending activity in Colorado is good relative to area credit needs and the bank's deposit market share. Over the evaluation period, ANB originated \$117 million in reportable home mortgage loans, \$226 million in small loans to businesses, and \$261 thousand in small loans to farms.

To analyze ANB's lending activity, we compared the bank's deposit market share with its lending market share for home mortgage loans and small loans to businesses. In comparing the market share percentages, we took into consideration that deposit market share information includes only deposit-taking financial institutions that had one or more branches

located in the AA. We also considered the impact that a very large credit union in this AA had on the bank's market share of deposits. In regard to the lending market share, we considered the data includes lenders who do not have deposit-taking facilities in ANB's AAs, but reported one or more home mortgage loans and one or more small loans to businesses in the AAs in 2006. In particular, we considered the impact that credit card banks and other credit card lenders have on the bank's market share of loans to small business. Due to the different populations of financial institutions included in the data, we did not expect ANB's deposit market share and lending market share percentages to match in order for performance to be considered good.

The level of lending in the Colorado Springs MSA is good. Based on June 30, 2006, FDIC deposit market share data, there were 43 deposit-taking financial institutions with one or more banking offices in the ANB's Colorado Springs AA. Based on dollar volume of deposits, ANB ranked 4th with a deposit market share of 8.39 percent. Peer small business loan data for 2006 indicates the bank ranked 16th among 104 lenders that reported small business loans with a market share of 0.53 percent based on number of loans. Peer home mortgage loan data for 2006 indicates the bank's market share is 0.12 percent for home purchase loans, 0.85 percent for home improvement loans, and 0.09 percent for home refinance loans.

The level of lending in the Denver-Aurora MSA is good. Based on June 30, 2006, FDIC deposit market share data, there were 86 deposit-taking financial institutions with one or more banking offices in the bank's Denver-Aurora AA. Based on dollar volume of deposits, ANB ranked 25th with a deposit market share of 0.76 percent. Peer small business loan data for 2006 indicates the bank ranked 29th among 187 lenders that reported small business loans with a market share of 0.13 percent. Peer home mortgage data for 2006 indicates ANB's market share is 0.09 percent for home purchase loans, 0.15 percent for home improvement loans, and 0.04 percent for home refinance loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the "State of Colorado" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall the geographic distribution of home mortgage loan products in low- and moderate-income census tracts in the bank's full-scope AAs is good. This is based on the overall good distribution of home mortgage loans in both the Colorado Springs and the Denver-Aurora MSAs.

The distribution of all home mortgage loan products in LMI geographies in the Colorado Springs MSA is good. The bank did not originate any home mortgage loans in low-income census tracts (CTs) in this MSA during the review period. However, demographic data indicates only 0.11 percent of the housing units in the low-income CTs in this AA are owner-occupied, which offers limited opportunities to originate any type of home mortgage loans to individuals or families in low-income geographies. The distribution of home purchase loans in

moderate-income CTs significantly exceeds the demographics and is excellent. Market share slightly exceeds overall market share. The distribution of home improvement loans in moderate-income CTs is good. The portion of loans in these CTs is below the demographics; but it is good. Market share is well below the bank's overall market share. The distribution of home refinance loans in moderate-income CTs is well below the demographics and is poor. The bank does not have a measurable market share for loans in moderate-income CTs.

The distribution of all home mortgage loan products in LMI geographies in the Denver-Aurora MSA is good. The bank did not originate or purchase any home purchase loans in low-income CTs; but distribution of home improvement and home refinance loans in low-income tracts is excellent compared to the demographics. Market share for home improvement loans in low-income CTs significantly exceeds overall market share; market share for home refinance loans exceeds overall market share. In moderate-income CTs, the portion of both home purchase and home improvement loans substantially exceeds the demographics. Market share for both types of loans in moderate-income CTs exceeds overall market share. The geographic distribution of home refinance loans in moderate-income CTs is adequate. Market share meets overall market share.

Small Loans to Businesses

Refer to Table 6 in the "State of Colorado" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Overall, the distribution of small loans to businesses in LMI geographies in ANB's full-scope AAs is excellent.

ANB's geographic distribution of small loans to businesses in LMI geographies in both the Colorado Springs MSA and the Denver-Aurora MSA is excellent. The percentage of loans ANB made in low- and moderate-income CTs in both the Colorado Springs MSA and the Denver-Aurora MSA substantially exceeds the percentage of businesses located in these CTs. In the Colorado Springs MSA, market share substantially exceeds overall market share in low- and in moderate-income CTs. In the Denver-Aurora MSA, market share exceeds overall market share in low- and in moderate-income CTs.

Lending Gap Analysis

We reviewed ANB's lending data which includes home mortgage loans and small loans to businesses made in the bank's AAs in order to identify gaps in the geographic distribution of these loans. After considering ANB's size, competition in the AAs, and demographic factors, we did not identify any conspicuous gaps in lending.

Inside/Outside Ratio

An analysis of ANB's concentration of lending within its AAs in Colorado revealed that a substantial majority of the number of home mortgage loans and small loans to businesses were originated or purchased in the bank's AAs. Ninety-five (95) percent of the HMDA loans and 99 percent of the small loans to businesses were originated or purchased in the bank's Colorado AAs. This positively impacted the overall Lending Test rating.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the “State of Colorado” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

Overall, distribution of home mortgage loans in ANB’s full-scope AAs is adequate. This is based on the adequate distribution of home mortgage loans in both the Colorado Springs MSA and the Denver-Aurora MSA. In evaluating the distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. The percentage of total households living below the poverty level based on the 2000 census is 8 percent in the Colorado Springs MSA and 10 percent in the Denver-Aurora MSA. This serves as a partial mitigating factor as to why the number of home mortgage loans to low-income borrowers is below the percentage of low-income families. However, this does not totally offset any poor performance.

In the Colorado Springs MSA, ANB’s distribution of home mortgage loans to borrowers of different income levels is adequate relative to the obstacles relating to high housing costs. The median price of a home was \$205,300 in 2005. Without financing assistance, a low-income family could only qualify for a home priced at 46 percent of the median. The obstacle of affordability was a factor throughout the evaluation period in the Colorado Springs MSA. (See Appendix B for additional information on housing affordability in the full-scope areas.) Distribution of home purchase loans to low-income borrowers is well below the demographic comparator and is poor. Market share slightly exceeds overall market share. Distribution of home improvement loans is very near the demographic comparator and is excellent. Market share of home improvement loans to low income borrowers substantially exceeds overall market share. The bank did not make any home refinance loans to low-income borrowers in this AA during the review period. Distribution of home purchase loans to moderate-income borrowers is good; the portion of loans to moderate-income borrowers is near the demographic comparator. Market share is near the overall market share. Distribution of both home improvement and home refinance loans is well below the demographic comparator and is poor. Market share for home improvement and home refinance loans to moderate-income borrowers is well below overall market share.

In the Denver-Aurora MSA, ANB’s distribution of home mortgage loans to borrowers of different income levels is good relative to the obstacles relating to high housing costs. In evaluating the distribution of home mortgage loans to borrowers of different income levels, we considered the affordability of homes in this MSA. The median price of a home was \$238,200 in 2006. Without financing assistance, a low-income family could only qualify for a home priced at 45 percent of the median. The obstacle of affordability was a factor throughout the evaluation period in the Denver-Aurora MSA. (See Appendix B for additional information on housing affordability in the full-scope areas.) Distribution of home purchase loans to low-income families is below the demographics; but it is good. The portion of home improvement loans to low-income borrowers significantly exceeds the demographics and is excellent. Market share exceeds overall market share for both. Distribution of home refinance loans is

well below the demographics. Market share is below overall market share. The portion of home purchase loans to moderate-income borrowers is lower than the demographics; but it is adequate. Market share for home purchase loans is below overall market share. The portion of home improvement and home refinance loans to moderate-income borrowers is near the demographics; and it is good. Market share for home improvement is slightly below overall market share; market share for home refinance loans is slightly above overall market share.

Small Loans to Businesses

Refer to Table 11 in the “State of Colorado” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

ANB’s distribution of small loans to businesses in its full-scope AAs is adequate. This is based on the adequate distribution of small loans to businesses in both the Colorado Springs and Denver-Aurora MSA.

The distribution of loans to small businesses (those with annual revenues of \$1 million or less) in the Colorado Springs MSA is adequate. The percentage of loans to small businesses is well below the percentage of small businesses in the MSA in 2005 and 2006. Peer market share data for 2006 indicates market share of loans to businesses with revenues of \$1 million or less is below overall market share. Over half (58 percent) of the bank’s small business loans are in amounts of \$100,000 or less which can be indicative that the bank is focusing on making loans to smaller businesses.

The bank’s distribution of loans to small businesses in the Denver-Aurora MSA is adequate. The percentage of loans to small businesses is well below the percentage of small businesses in the MSA in 2005 and 2006. Market share of loans made to small businesses meets overall market share. In addition, over half (55 percent) of the bank’s small business loans are in amounts of \$100,000 or less which can be indicative that the bank is focusing on making loans to smaller businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the “State of Colorado” section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

The bank originated 12 community development loans totaling just over \$3.7 million in the Colorado Springs MSA and no community development loans in the Denver-Aurora MSA during this review period. The loans were responsive to the credit needs of CD organizations in the bank’s Colorado Springs AA. Most of the CD loans (\$2.8 million) helped provide affordable housing for LMI. The remaining \$906 thousand provided loans to organizations that provide services for low- and moderate-income individuals. The level of CD loans did not have a significant impact on the overall Lending Test Rating for the State of Colorado.

In addition, the bank originated \$4.9 million in community development loans in an MSA outside the bank's AAs.

Product Innovation and Flexibility

ANB participates in a grant program with El Paso County to provide flexible loans to low- and moderate-income first time home buyers. In 2006, the bank originated three loans totaling \$437,268. Two were to qualified low-income home buyers and one was to a moderate-income homebuyer in the Colorado Springs MSA. This minimally impacted the Lending Test conclusions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Grand Junction MSA, the Greeley MSA, the Eagle, Garfield, and Pitkin Counties non-MSA, and the San Miguel non-MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in Colorado. In addition, the bank provided a \$292 thousand CD loan in the Grand Junction AA and a \$363 thousand CD loan in the bank's Eagle/Garfield, and Pitkin Counties AA. Performance in the Boulder MSA is weaker than the bank's overall Lending Test performance. Both geographic and borrower distribution of home mortgage loans is weak. The bank did not originate any home mortgage loans in LMI CTs and only originated one loan to a low-income borrower in the Boulder MSA. However, the bank only made a total of six home mortgage loans in the Boulder MSA during this review period. Distribution of small loans to businesses is consistent with that noted in the full-scope AAs. This did not adversely impact the bank's overall "Low Satisfactory" rating for the Lending Test.

INVESTMENT TEST

Refer to Table 14 in the "State of Colorado" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

ANB's performance under the investment test in Colorado is rated "Low Satisfactory". This conclusion is primarily based on the dollar volume of qualified investments in the Colorado Springs and Denver-Aurora MSAs. Based on full-scope reviews, the bank's performance in the Colorado Springs MSA is "Needs to Improve"; and in the Denver MSA, it is "Outstanding".

The bank originated 95 qualified investments totaling just over \$7.2 million and had a prior period investment totaling almost \$500 thousand in its Colorado AAs. We allocated investments by AA, comparing the dollar volume to allocated Tier One Capital as a reference.

ANB invested almost \$174 thousand in the Colorado Springs MSA. This is less than 1 percent of allocated Tier One Capital. Considering the opportunities for qualified investments in this AA, this level of investments represents poor performance. The investments consist of qualified donations to 60 community development organizations. The donations were made to organizations that provide affordable housing for LMI individuals, provide services to LMI individuals, or promote economic development.

ANB's performance in the Denver-Aurora MSA is excellent. A majority, or 98 percent, of the bank's investments are in the Denver-Aurora MSA. Prior and current period investments total \$7.5 million and equal 29 percent of allocated Tier One Capital. The largest portion of the investments consists of mortgage-backed securities which support affordable housing for LMI individuals. Although these investments are not innovative, they are very responsive to a significant community development need in the Denver-Aurora MSA. The remaining investments consist of donations made to organizations that provide affordable housing for LMI individuals, provide services to LMI individuals, or promote economic development.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Grand Junction MSA and the Eagle, Garfield, and Pitkin non-MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Colorado. In the Boulder and Greeley MSAs and the San Miguel County non-MSA, performance is weaker. ANB did not provide any investments in these AAs. However, this does not detract from the bank's overall "Low Satisfactory" performance.

Refer to Table 14 in the "State of Colorado" section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

ANB's performance under the Service Test in Colorado is rated "Outstanding". Based on full-scope reviews, performance in the Colorado Springs and Denver-Aurora MSAs is excellent.

Retail Banking Services

Refer to Table 15 in the "State of Colorado" section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. Branch distribution received the most weight in rating the bank's performance under the service test.

Service delivery systems are readily accessible to geographies and individuals of different income levels in ANB's AAs. This is based on the excellent distribution of branches in the Colorado Springs MSA and the good distribution in the Denver-Aurora MSA. In the Colorado Springs MSA, the percentage of branches in low-income geographies is significantly above the percentage of the population that lives in these geographies. The percentage of branches in moderate-income geographies in the Colorado Springs MSA is below the percentage of the population that lives in these geographies; however, the overall proximity of a branch in a middle-income CT that borders three moderate-income CTs compensates. In the Denver-Aurora MSA, the percentage of branches in moderate-income geographies significantly exceeds the portion of the population living in these geographies. ANB does not have any branches in low-income geographies in the Denver-Aurora MSA.

The bank did not open or close any branches or ATMs in its full-scope AAs during this review period.

ANB's ATM network offers a reasonable alternative system for delivering retail banking services in LMI geographies. In the Colorado Springs MSA, 20 percent of the ATMs are located in low-income CTs and 20 percent are located in moderate-income CTs. This significantly exceeds the portion of the population living in low-income CTs and nearly meets the portion of the population living in moderate-income CTs. In the Denver-Aurora MSA, 33 percent of the ATMs are located in moderate-income CTs. This exceeds the portion of the population living in moderate-income geographies. There are no ATMs in low-income CTs.

Alternative delivery systems also include 24-hour telephone banking and Internet banking services, as well as banking by mail. ANB customers are able to obtain deposit and loan account information, pay bills electronically, and transfer funds. ANB offers a variety of free and low-cost checking accounts, as well as free on-line banking to all customers, including those who are LMI.

Banking hours and services in the Colorado Springs and Denver-Aurora MSAs do not vary significantly at the different branches. They are tailored to meet the needs of each community. Lobby and drive-up hours for branches located in low- and moderate-income geographies are substantially similar to those offered in other geographies. Although some of the branches located in low- and moderate-income CTs do not offer Saturday hours, management made the decision not to continue to offer Saturday hours at these branches because there was not enough traffic to warrant keeping the branches open. Full service banking is offered during regular business hours at all locations.

Community Development Services

ANB provided a very high level of CD services to qualified CD organizations in its Colorado AAs during this evaluation period. The bank provided 3,255 hours of qualified CD services to 29 CD organizations in the Colorado Springs MSA. ANB also provided 1,466 hours of qualified CD services to 21 CD organizations in the Denver-Aurora MSA. CD services included serving on fundraising committees, serving as board members, and providing financial education to LMI individuals. A substantial majority of the services were to CD organizations that either help provide affordable housing for LMI individuals or provide services to LMI individuals.

Wyoming Rating

State of Wyoming

CRA Rating for Wyoming:

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Outstanding

The major factors that support this rating include:

- ANB's level of originated and purchased loans in its full-scope Wyoming AA is good; lending levels are consistent with the bank's strategic focus and financial resources.
- The geographic distribution of ANB's home mortgage loans is poor; but the geographic distribution of small loans to businesses is excellent.
- ANB's distribution of home mortgage loans to borrowers of different income levels is good; distribution of loans to businesses of different sizes is excellent.
- ANB participates in a flexible loan product to help meet the credit needs of its Wyoming AAs.
- ANB demonstrated adequate performance in providing qualified community development investments and grants. The bank originated \$265 thousand in community development loans in its Cheyenne AA.
- Branch delivery systems provide excellent accessibility to individuals living in LMI geographies in its larger markets and reasonable accessibility in its smaller markets.
- ANB provided a high level of community development services to its Wyoming AAs during this review period.

Description of Institution's Operations in Wyoming

Refer to the market profiles for the Cheyenne MSA in Appendix C for detailed demographics and other performance context information.

ANB operates eight branches and 21 ATMs in the state of Wyoming. Based on dollar volume, Wyoming operations account for 39 percent of the bank's loans and 22 percent of the bank's deposits.

The bank is a full service bank with four AAs in Wyoming. ANB's major competitors in the Cheyenne MSA are Bank of the West; First Interstate Bank; First National Bank of Wyoming; Pinnacle Bank; Security First Bank; Tri-County National Bank; U.S. Bank, N.A.; Wells Fargo Bank, N.A.; and Wyoming Bank and Trust.

Scope of Evaluation in Wyoming

The Cheyenne MSA received a full-scope review. The Casper MSA and the non-MSAs of Albany County and Northern Wyoming, which includes Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties, received limited-scope reviews.

We reviewed one community contact that was recently performed in this AA. The contact stated there is a need for small business financing and affordable housing loans. There is also a need for banks to provide technical expertise, loan referrals, and opportunities to serve on local community development financial institution boards and lending committees.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Wyoming is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Cheyenne MSA is good.

Lending Activity

Refer to Table 1 Lending Volume in the "State of Wyoming" section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending activity in Wyoming is good relative to area credit needs and the bank's deposit market share. Over the evaluation period, ANB originated \$109 million in reportable home mortgage loans, \$96 million in small loans to businesses and nearly \$17 million in small loans to farms.

To analyze ANB's lending activity, we compared the bank's deposit market share with its lending market share for home mortgage loans and small loans to businesses. In comparing the market share percentages, we took into consideration that deposit market share information includes only deposit-taking financial institutions that had one or more branches located in the AA. Lending market share information, on the other hand, includes lenders who do not have deposit-taking facilities in ANB's AAs, but reported one or more home mortgage loans and one or more small loans to businesses in the AAs in 2005. Due to the different populations of financial institutions included in the data, we did not expect ANB's deposit market share and lending market share percentages to match in order for performance to be considered good.

The level of lending in the Cheyenne MSA is good. Based on June 30, 2006, FDIC deposit market share data, there were 17 deposit-taking financial institutions with one or more banking offices in the bank's Cheyenne AA. Based on dollar volume of deposits, ANB ranked 2nd with a deposit market share of 12.67 percent. Peer small business loan data for 2006 indicates the bank ranked 9th among 35 lenders that reported small business loans in the Cheyenne MSA, with a market share of 3.45 percent. Peer home mortgage data for 2006 indicates the bank's

market share is 1.12 percent for home purchase loans, 0.30 percent for home improvement loans, and 0.67 percent for home refinance loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations/purchases.

Overall, the geographic distribution of home mortgage loans in the Cheyenne MSA is poor. This is based on the distribution of home mortgage loans in moderate-income census tracts. There are no low-income census tracts in the Cheyenne MSA.

The distribution of home purchase loans in moderate-income CTs is well below the demographic comparator and is poor. The distribution of home refinance loans is also below the demographic comparator, but it is adequate. Market share of home purchase loans is slightly below overall market share for both types of loan products. An analysis of home improvement loans is not meaningful, since the bank originated only 5 home improvement loans in the Cheyenne MSA during this review period.

Small Loans to Businesses

Refer to Table 6 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

Distribution of small loans to businesses in moderate-income geographies is excellent. The portion of small loans to businesses in moderate-income CTs exceeds the portion of businesses that are located in these tracts. Data indicates the bank’s market share in moderate-income CTs significantly exceeds overall market share.

Lending Gap Analysis

We reviewed ANB’s lending data which includes home mortgage loans and small loans to businesses made in the bank’s AAs in order to identify gaps in the geographic distribution of these loans. After considering ANB’s size, competition in the AAs, and demographic factors, we did not identify any conspicuous gaps in lending.

Inside/Outside Ratio

An analysis of ANB’s concentration of lending within its AAs in Wyoming revealed that a substantial majority of the number of home mortgage loans and small loans to businesses were originated or purchased in the bank’s AAs. Eighty-nine (89) percent of the HMDA loans and 99 percent of the small loans to businesses were originated or purchased in the bank’s Wyoming AAs. This positively impacted the overall Lending Test rating.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans to low- and moderate-income individuals is good. We based our conclusions primarily on the distribution of home purchase loans since these represent a majority of the bank’s home mortgage loans and they also respond to a significant need in the bank’s AA. In evaluating the distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. The percentage of total households living below the poverty level based on the 2000 census is 9 percent in the Cheyenne MSA. This serves as a partial mitigating factor as to why the number of home mortgage loans to low-income borrowers is below the percentage of low-income families. However, this would not totally offset any poor performance.

The distribution of home purchase loans to low- and moderate-income borrowers is good. The portion of lending to low-income borrowers is well below the demographics; market share is also well below overall market share. The portion of loans to moderate-income borrowers is above the demographics and is excellent. Market share is slightly below overall market share. The distribution of home refinance loans to low- and moderate-income borrowers is below the demographics; but it is adequate. The bank has no measurable market share of loans to low-income borrowers. Market share of loans to moderate-income borrowers is well below overall market share. Data for home improvement loans to borrowers of different income levels is not meaningful since the bank only originated five home improvement loans during the entire review period.

Small Loans to Businesses

Refer to Table 11 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

ANB’s distribution of small business loans in the Cheyenne MSA is excellent. The percentage of loans to small businesses (those with annual revenues of \$1 million or less) is well above the percentage of small businesses in the Cheyenne MSA. The bank’s market share of loans to small businesses exceeds overall market share. The fact that 100 percent of the bank’s small loans to businesses was made in amounts of \$250,000 or less is further indicative of the emphasis the bank has placed on making loans to smaller businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition,

Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank originated three community development loans totaling \$265 thousand in the Cheyenne MSA during this review period. This level of lending did not have a significant impact on the overall Lending Test conclusions for the State of Wyoming.

Product Innovation and Flexibility

The bank participates in the Wyoming Community Development Authority (WCDA) Homebuyer Program which is a flexible loan program to assist LMI first-time homebuyers in purchasing a home in Wyoming. The program offers qualifying homebuyers a below market interest rate loan and down payment assistance. The program allows a borrower to obtain a second mortgage loan to assist with the down payment. The interest rate for the second mortgage loan varies depending on the income of the homebuyer. During the review period, the bank originated 26 first mortgage loans totaling \$3.5 million and 17 second mortgage loans totaling over \$40 thousand in its Cheyenne AA. Fourteen (14) of the first mortgage and eight of the second mortgage loans were to low- and moderate-income borrowers. This had a positive impact on the Lending Test conclusions.

Under the WCDA program, the bank made an additional 140 first mortgage loans and 71 second mortgage loans to low- and moderate-income borrowers in the bank's limited-scope AAs and another 18 first mortgage loans and ten second mortgage loans to low- and moderate-income borrowers outside the bank's AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Casper MSA and the Albany and Northern Wyoming non-MSAs is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in the state of Wyoming. In Albany County, the bank's performance is stronger than the bank's overall performance in Wyoming. The distribution of home purchase loans in moderate-income geographies and the distribution of all home mortgage loan products to moderate-income borrowers is significantly stronger. In the Casper MSA and Northern Wyoming non-MSA, the bank's performance is similar to overall performance in the state of Wyoming. In addition, the bank provided a community development loan in the Northern Wyoming AA totaling \$3 million. ANB is the lead bank in this loan which helped stabilize the local distressed middle-income geography by providing funds to an industry that provides jobs for low- and moderate-income individuals in this AA.

Refer to the Tables 1 through 12 in the "State of Wyoming" section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the bank’s level of qualified investments.

The bank’s performance under the investment test in Wyoming is rated “Low Satisfactory”. Based on full-scope reviews, the bank’s performance in the Cheyenne MSA is adequate.

The bank originated 105 qualified investments totaling over \$82 thousand in its Wyoming AAs. Over \$32 thousand, or 39 percent, was invested in the Cheyenne AA. We allocated investments by AA, comparing the dollar volume to allocated Tier One Capital as a reference. The bank’s investment in the Cheyenne MSA represents less than 1 percent of allocated Tier One Capital. We considered this to be adequate considering that opportunities to invest in this AA are limited because of the lack of a well-developed community development infrastructure. All of the investment funds consist of donations to organizations that provide affordable housing for LMI individuals, provide services to LMI individuals, or promote economic development.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance in the Casper MSA and the Albany County and Northern Wyoming non-MSAs is not inconsistent with the bank’s overall low-satisfactory performance under the Investment Test in the state of Wyoming.

Refer to the Table 14 in the “State of Wyoming” section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the service test in state of Wyoming is rated “Outstanding”. Based on full-scope reviews, the bank’s performance in the Cheyenne MSA is excellent.

Retail Banking Services

Refer to Table 15 in the “State of Wyoming” section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

Service delivery systems are readily accessible to geographies and individuals of different income levels in ANB’s Wyoming AAs. This is based on the excellent distribution of branches in the Cheyenne MSA. The distribution of branches in moderate-income CTs exceeds the

portion of the population that resides in moderate-income geographies. There are no low-income CTs in the MSA.

The bank did not open or close any branches or ATMs in its full-scope AA during this review period.

ANB's ATM network offers a reasonable alternative system for delivering retail banking services in moderate-income geographies. In the Cheyenne MSA, 33 percent of the ATMs are located in moderate-income CTs. This exceeds the portion of the population that resides in these geographies.

Alternative delivery systems also include 24-hour telephone banking and Internet banking services, as well as banking by mail. ANB customers are able to obtain deposit and loan account information, pay bills electronically, and transfer funds. ANB offers a variety of free and low-cost checking accounts, as well as free on-line banking to all customers, including those who are LMI.

Banking hours and services in the Cheyenne MSA do not vary significantly at the different branches. They are tailored to meet the needs of each community. Lobby and drive-up hours for branches located in moderate-income geographies are substantially similar to those offered in other geographies. Although the branch located in a moderate-income CT does not offer Saturday hours, management made the decision not to continue to open the branch on Saturdays due to the low volume of traffic as well as the opening of two other nearby full service branches conveniently located in grocery stores. These branches offer Saturday and extended hours; and one of the in-store branches also offers Sunday hours. Full service banking is offered during regular business hours at all branches.

Community Development Services

ANB provided a high level of CD services to its full-scope Wyoming AA during this evaluation period. The bank provided 785 hours of qualified CD services to 11 CD organizations in the Cheyenne MSA. Services primarily included serving as board members for organizations that provide services for LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Casper MSA and the Albany non-MSA is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in Wyoming. In the Northern Wyoming non-MSA, the bank's performance is weaker than the bank's overall performance in the state. All three branches in this AA are located in middle-income CTs. However, this does not detract from the bank's overall "Outstanding" performance under the Service Test.

Refer to Table 15 in the "State of Wyoming" section of Appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 1/1/05 to 12/31/06	
	Investment and Service Tests and CD Loans: 1/3/04 to 3/25/07	
Financial Institution	Products Reviewed	
American National Bank (ANB), Denver, Colorado	--Home mortgage loans, including home purchase, home improvement, and home refinance. --Small loans to businesses. --Community development loans. --Community development investments. --Community development services. And --Retail bank services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Colorado Colorado Springs MSA #17829 Denver-Aurora MSA #19740 Boulder MSA #14500 Grand Junction MSA #24300 Greeley MSA #24540 Eagle-Garfield-Pitkin Non-MSA San Miguel Non-MSA Wyoming Cheyenne MSA #16940 Casper MSA #16220 Albany Non-MSA Northern Wyoming Non-MSA	Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited Scope Limited Scope Limited Scope	

Appendix B: Summary of State Ratings

RATINGS		AMERICAN NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank State Rating
American National Bank	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory
State:				
Colorado	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Wyoming	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

STATE OF COLORADO FULL-SCOPE ASSESSMENT AREAS

Colorado Springs MSA #17829

Demographic Information for Full-Scope Area: Colorado Springs MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	117	0.85	28.21	48.72	22.22	0.00
Population by Geography	537,484	0.32	25.37	49.82	24.49	0.00
Owner-Occupied Housing by Geography	130,909	0.11	18.75	51.81	29.33	0.00
Business by Geography	46,273	5.02	23.26	44.35	27.36	0.00
Farms by Geography	1,001	2.80	14.29	55.14	27.77	0.00
Family Distribution by Income Level	141,012	16.86	18.85	24.72	39.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,346	0.32	38.71	49.60	11.37	0.00
HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		\$63,100 8%	Median Housing Value as of 12/31/05 Unemployment Rate as of 12/31/06		\$205,300.	4.2%

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2006 HUD updated MFI

The Colorado Springs MSA consists of El Paso and Teller Counties. Colorado Springs is located in the southern portion of the Front Range of eastern Colorado. The Colorado Springs MSA has excellent north and south accessibility via Interstate 25.

Based on the 2000 US Census data, the Colorado Springs MSA consists of 117 CTs. Less than 1 percent or 0.85 percent consists of low-income CTs and 28 percent are moderate-income. ANB operates five branches and five ATMs in this AA. The Colorado Springs MSA represents 35 percent of area deposits and 23 percent of reportable loans.

The area is heavily banked with 43 banks operating 150 branches. Wells Fargo Bank, N.A. and U.S. Bank, N.A. have the largest presence with 29 percent market share of deposits. ANB's market share is 8 percent.

Economic conditions in the Colorado Springs MSA are generally stable. The major employer in this AA is the federal government. Approximately 20 percent of the population is employed by the Department of Defense. In addition to the Fort Carson Army Base, there are several large military installations in the Colorado Springs MSA, including Peterson Air Force Base, Schriever Air Force Base, and the U.S. Air Force Academy. Other major industries include services, retail trade, tourism, and construction. As of December 31, 2006, the unemployment rate was at 4.2 percent. The HUD updated median family income for 2006 was \$63,100. The most current data indicates the median home price as of 2005 was \$205,300.

We reviewed two community contacts that were recently performed in this AA. The contacts stated there are concerns with the increasing number of people living in poverty. Currently, there is a need for alternative lending sources for low- and moderate-income individuals. There is also a need for loans to small business. One of the contacts also expressed concern that payday lenders are taking advantage of low- and moderate-income individuals.

Denver-Aurora MSA # 19740

Demographic Information for Full-Scope Area: Denver-Aurora MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	545	3.85	26.61	39.63	27.89	2.02
Population by Geography	2,179,240	4.56	27.71	40.28	27.32	0.12
Owner-Occupied Housing by Geography	570,412	1.89	21.89	42.97	33.26	0.00
Businesses by Geography	198,117	3.88	24.37	37.62	33.28	0.85
Farms by Geography	3,622	1.60	21.54	40.56	35.89	0.41
Family Distribution by Income Level	550,797	18.01	18.65	23.68	39.66	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	201,889	7.68	41.89	37.34	13.09	0.00
HUD Adjusted Median Family Income for 2006	\$71,700		Median Housing Value as of 12/31/06		\$244,200	
Households Below the Poverty Level	10%		Unemployment Rate as of 12/31/06		4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2006 HUD updated MFI.

The Denver-Aurora MSA consists of the following counties: Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park. Denver is located in the Front Range area of eastern Colorado. (The Front Range extends along Interstate 25 from Colorado Springs to Fort Collins and is home to 75 percent of Colorado's population.) The Denver-Aurora MSA is the 22nd largest metropolitan statistical area in the United States with a population of 2.3 million. This represents over half of Colorado's population. The Denver-Aurora MSA has excellent north and south accessibility via Interstate 25, and east and west convenience of Interstate 70. Excellent rail service, including light rail, and Denver International Airport are also available.

Based on the 2000 US Census data, the Denver-Aurora MSA consists of 526 CTs: 21 or 3.99 percent are low-income and 145 or 27.57 percent are moderate-income. ANB operates three branches and three ATM's in the Denver-Aurora MSA. The Denver-Aurora MSA represents 30 percent of rated loans made during the review period and 25 percent of total bank deposits.

The area is heavily banked with eighty-six chartered banks operating 671 branches. Wells Fargo Bank, N.A. and U.S. Bank, N.A. have the largest presence with a 31 percent market share of deposits. ANB's market share is 0.76 percent as of June 30, 2006.

The population of the Denver-Aurora MSA has increased approximately 6 percent since the 2000 Census, an average annual rate of 1.2 percent. (Source 2005 American Community Survey, US Census Bureau)

As of first quarter 2006, job growth in the Denver-Aurora MSA was on par with the state and above national figures: Denver-Aurora MSA 2.3 percent, Colorado, 2.3 percent and the US, 1.5 percent. The unemployment rate for the Denver-Aurora MSA as of December 31, 2006, is at 3.9 percent. Health care and social assistance, professional and technical service, and tourism services are the largest employers for the area.

Colorado is one of the fifteenth wealthiest states in the country. This is reflective of the median family income for the Denver-Aurora MSA. The 2006 HUD updated median family income for the Denver-Aurora MSA was \$71,700.

While the median family income for the AA is high, the cost of living is also high. In 2003, a median priced home was 32 percent higher than the national average.¹ The median price of a home only rose 3.7 percent, from \$238,200 in 2003 to \$247,100 in 2005. First quarter 2006 data indicates the median price of a home in the Denver-Aurora MSA was at \$244,200, the 39th highest median price in the nation. Without financing assistance, a low-income family could only qualify for a home priced at 45 percent of the median². The obstacle of housing affordability was a factor throughout the evaluation period in the Denver-Aurora MSA. Understandably, the most pressing community need in the AA is affordable housing.

Since November 2001, 68 Low Income Housing Tax Credit projects were allocated in the Denver-Aurora MSA providing 6,066 units of affordable housing. There are ten HUD certified Community Housing Development Organizations and a housing authority active in the Denver-Aurora MSA.

The community development investment opportunities in the Denver-Aurora MSA are good. There is an SBA Small Business Development Center and three SBA Certified Development Companies active in the Denver-Aurora MSA. There are five SBICs active in Colorado. There are a number of community development corporations and small business gap lenders active in the Denver-Aurora MSA including Denver Enterprise Center, Colorado Enterprise Fund, Colorado Alliance for Microenterprise Initiatives (CAMI), and the Colorado Office of Economic Development. Through other contacts with community leaders, we learned that there are opportunities to partner with organizations that provide small business loans and offer management assistance to businesses owned by women, minorities, and LMI individuals.

1 National Association of Realtors 2006

2 Assumes 80% LTV, monthly payment not to exceed qualifying ratio of 25%

STATE OF WYOMING FULL-SCOPE ASSESSMENT AREA

Cheyenne MSA #16940

Demographic Information for Full Scope Area: ANB Cheyenne						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0.00	33.33	50.00	16.67	0.00
Population by Geography	81,607	0.00	30.33	48.51	21.16	0.00
Owner-Occupied Housing by Geography	22,050	0.00	23.38	51.37	25.25	0.00
Business by Geography	7,584	0.00	40.49	42.66	16.85	0.00
Farms by Geography	278	0.00	12.59	57.91	29.50	0.00
Family Distribution by Income Level	21,825	17.14	19.99	24.55	38.32	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,102	0.00	38.71	48.10	13.19	0.00
HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		\$59,900 9%	Median Housing Value as of 3/31/05 Unemployment Rate as of 12/31/06		\$153,374 4.1%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2006 HUD updated MFI

The Cheyenne MSA consists of Laramie County. Cheyenne is located in the southern border of Wyoming. The Cheyenne MSA has excellent north and south accessibility via Interstate 25.

Based on the 2000 US Census data, the Cheyenne MSA consists of 18 CTs. Thirty-three (33) percent of the CTs are moderate-income. There are no low-income CTs in the MSA. ANB operates two branches and eleven ATMs in this AA. The Cheyenne MSA represents 43 percent of area deposits and 21 percent of reportable loans.

The area is moderately banked with 17 banks operating 28 branches. U.S. Bank, N.A. has the largest presence with 24 percent market share of deposits. ANB's market share is 13 percent.

Cheyenne's economy is based mainly on military and government, as well as light manufacturing, agriculture, and transportation. Cattle- and sheep-raising continue to be important in the region. The economy of Cheyenne has become more diversified with the development of industries such as fertilizer processing plants. However, Cheyenne's largest employer is F.E. Warren Air Force Base with about 4,200 military and civilian employees. The federal government employees 3,000 non-military employees and state government employs nearly as many. As of December 2006, the unemployment rate was at 4.1 percent. The HUD updated median family income for 2006 was \$59,900. The most current data indicates that the median home price as of first quarter 2005 was \$153,374.

We reviewed one community contact that was recently performed in this AA. The contact stated there is a need for small business financing and affordable housing loans. There is

also a need for banks to provide technical expertise, loan referrals, and opportunities to serve on local community development financial institution boards and lending committees.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. 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: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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 and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased 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 share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased 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 share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased 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. In addition, the table presents the percentage distribution of the number of loans originated and purchased 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 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased 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. In addition, the table presents the percentage distribution of the number of loans originated and purchased 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 13. Geographic and Borrower Distribution of Consumer Loans (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 households 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 MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of Colorado

Table 1. Lending Volume

LENDING VOLUME												Geography: COLORADO		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006	
MA/Assessment Area (2007):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Colorado Springs	23.55	119	14,739	300	62,367	2	261	12	3,706	433	81,073	35.54			
Denver	29.53	197	30,286	346	71,484	0	0	0	0	543	101,770	25.38			
Limited Review:															
Boulder MA	2.66	6	1,475	43	9,878	0	0	0	0	49	11,353	2.51			
Eagle Garfield Pitkin	26.64	178	42,854	311	52,244	0	0	1	363	490	95,461	18.43			
Grand Junction	14.74	147	15,127	123	25,434	0	0	1	292	271	40,853	15.20			
Greeley	0.54	5	466	5	1,692	0	0	0	0	10	2,158	0.00			
San Miguel	2.34	21	12,014	22	3,100	0	0	0	0	43	15,114	2.94			
Other:															
Outside AA (State of Color								2	\$4,904						

* Loan Data as of December 31, 2006. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2006 to December 31, 2006.

*** Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2006			Geography: COLORADO				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Colorado Springs	42	12.24	0.11	0.00	18.75	26.19	51.81	38.10	29.33	35.71	0.12	0.00	0.15	0.09	0.10	
Denver	122	35.57	1.89	0.00	21.89	31.15	42.97	41.80	33.26	27.05	0.09	0.00	0.16	0.08	0.06	
Limited Review:																
Boulder MA	4	1.17	0.27	0.00	19.36	0.00	44.99	50.00	35.39	50.00	0.69	0.00	0.00	1.34	0.54	
Eagle Garfield Pitkin	83	24.20	0.00	0.00	0.00	0.00	16.57	31.33	83.43	68.67	0.46	0.00	0.00	0.63	0.42	
Grand Junction	73	21.28	0.00	0.00	14.19	9.59	60.18	68.49	25.63	21.92	0.50	0.00	0.47	0.53	0.44	
Greeley	3	0.87	0.70	0.00	14.59	66.67	53.62	33.33	31.09	0.00	0.02	0.00	0.19	0.02	0.00	
San Miguel	16	4.66	0.00	0.00	0.00	0.00	25.85	12.50	74.15	87.50	3.12	0.00	0.00	5.13	2.91	

* Based on 2006 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2006		Geography: COLORADO								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	40	40.00	0.11	0.00	18.75	15.00	51.81	52.50	29.33	32.50	0.85	0.00	0.48	0.77	1.18
Denver	21	21.00	1.89	9.52	21.89	33.33	42.97	28.57	33.26	28.57	0.15	1.12	0.28	0.09	0.10
Limited Review:															
Boulder MA	0	0.00	0.27	0.00	19.36	0.00	44.99	0.00	35.39	0.00	0.00	0.00	0.00	0.00	0.00
Eagle Garfield Pitkin	15	15.00	0.00	0.00	0.00	0.00	16.57	26.67	83.43	73.33	2.64	0.00	0.00	4.17	2.28
Grand Junction	23	23.00	0.00	0.00	14.19	4.35	60.18	47.83	25.63	47.83	2.84	0.00	1.89	1.51	6.76
Greeley	0	0.00	0.70	0.00	14.59	0.00	53.62	0.00	31.09	0.00	0.00	0.00	0.00	0.00	0.00
San Miguel	1	1.00	0.00	0.00	0.00	0.00	25.85	0.00	74.15	100.00	2.70	0.00	0.00	0.00	3.33

* Based on 2006 Peer Mortgage Data (Western)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2006			Geography: COLORADO								Evaluation Period: JANUARY 1, 2005 TO				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	36	16.00	0.11	0.00	18.75	2.78	51.81	41.67	29.33	55.56	0.09	0.00	0.00	0.05	0.19
Denver	51	22.67	1.89	7.84	21.89	17.65	42.97	33.33	33.26	41.18	0.04	0.08	0.04	0.03	0.04
Limited Review:															
Boulder MA	2	0.89	0.27	0.00	19.36	0.00	44.99	100.00	35.39	0.00	0.01	0.00	0.00	0.02	0.00
Eagle Garfield Pitkin	79	35.11	0.00	0.00	0.00	0.00	16.57	25.32	83.43	74.68	0.99	0.00	0.00	1.89	0.82
Grand Junction	51	22.67	0.00	0.00	14.19	19.61	60.18	64.71	25.63	15.69	0.53	0.00	0.48	0.58	0.43
Greeley	2	0.89	0.70	0.00	14.59	0.00	53.62	100.00	31.09	0.00	0.02	0.00	0.00	0.04	0.00
San Miguel	4	1.78	0.00	0.00	0.00	0.00	25.85	0.00	74.15	100.00	1.06	0.00	0.00	0.00	1.21

* Based on 2006 Peer Mortgage Data (Western)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 31, 2006			Geography: COLORADO								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	300	26.25	5.02	7.67	23.26	33.00	44.35	41.33	27.36	18.00	0.53	1.00	0.95	0.51	0.30
Denver	339	29.66	3.77	7.37	23.47	35.69	37.99	28.32	33.92	28.61	0.13	0.32	0.21	0.10	0.09
Limited Review:															
Boulder MA	43	3.76	1.22	0.00	31.27	37.21	38.52	39.53	28.96	23.26	0.10	0.00	0.11	0.11	0.08
Eagle Garfield Pitkin	311	27.21	0.00	0.00	0.00	0.00	11.30	14.79	88.70	85.21	1.24	0.00	0.00	1.96	1.34
Grand Junction	123	10.76	0.00	0.00	26.80	22.76	51.44	57.72	21.76	19.51	0.75	0.00	0.84	0.84	0.62
Greeley	5	0.44	5.85	0.00	12.65	0.00	49.78	100.00	31.58	0.00	0.01	0.00	0.00	0.02	0.00
San Miguel	22	1.92	0.00	0.00	0.00	0.00	12.22	9.09	87.78	90.91	1.19	0.00	0.00	1.00	1.52

* Based on 2006 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2006).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COLORADO						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families3	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	42	12.21	16.86	5.13	18.85	17.95	24.72	25.64	39.57	51.28	0.12	0.17	0.11	0.10	0.12
Denver	123	35.76	18.01	10.81	18.65	12.61	23.68	23.42	39.66	53.15	0.09	0.20	0.06	0.08	0.11
Limited Review:															
Boulder MA	4	1.16	19.44	0.00	18.52	0.00	22.39	0.00	39.66	100.00	0.69	0.00	0.00	0.00	0.02
Eagle Garfield Pitkin	83	24.13	9.52	3.80	13.20	16.46	20.06	12.66	57.22	67.09	0.46	4.35	2.97	0.36	0.74
Grand Junction	73	21.22	17.40	11.27	19.63	21.13	23.69	23.94	39.28	43.66	0.50	1.49	0.81	0.64	0.48
Greeley	3	0.87	19.33	0.00	17.93	33.33	24.16	0.00	38.59	66.67	0.02	0.03	0.00	0.06	0.04
San Miguel	16	4.65	14.57	0.00	10.55	6.67	19.29	26.67	55.59	66.67	3.12	0.00	8.33	14.29	2.52

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 6.7% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2006		Geography: COLORADO								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total* *	% Famili es***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	40	40.00	16.86	15.79	18.85	7.89	24.72	18.42	39.57	57.89	0.85	2.08	0.48	0.58	1.03
Denver	21	21.00	18.01	22.22	18.65	16.67	23.68	22.22	39.66	38.89	0.15	0.34	0.12	0.05	0.12
Limited Review:															
Boulder MA	0	0.00	19.44	0.00	18.52	0.00	22.39	0.00	39.66	0.00	0.00	0.00	0.00	0.00	0.00
Eagle Garfield Pitkin	15	15.00	9.52	0.00	13.20	9.09	20.06	9.09	57.22	81.82	2.64	0.00	9.09	0.00	1.79
Grand Junction	23	23.00	17.40	14.29	19.63	33.33	23.69	19.05	39.28	33.33	2.84	5.88	2.33	2.68	2.45
Greeley	0	0.00	19.33	0.00	17.93	0.00	24.16	0.00	38.59	0.00	0.00	0.00	0.00	0.00	0.00
San Miguel	1	1.00	14.57	0.00	10.55	0.00	19.29	0.00	55.59	100.00	2.70	0.00	0.00	0.00	3.13

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 11.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2006			Geography: COLORADO						Evaluation Period: JANUARY 1, 2005 TO DECEMBER						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families5	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs	36	16.00	16.86	0.00	18.85	8.82	24.72	11.76	39.57	79.41	0.09	0.00	0.03	0.04	0.21
Denver	51	22.67	18.01	6.38	18.65	17.02	23.68	27.66	39.66	48.94	0.04	0.03	0.05	0.04	0.06
Limited Review:															
Boulder MA	2	0.89	19.44	50.00	18.52	0.00	22.39	0.00	39.66	50.00	0.01	0.15	0.00	0.00	0.03
Eagle Garfield Pitkin	79	35.11	9.52	4.05	13.20	6.76	20.06	14.86	57.22	74.32	0.99	9.09	1.50	1.41	0.99
Grand Junction	51	22.67	17.40	8.16	19.63	20.41	23.69	26.53	39.28	44.90	0.53	0.97	0.57	0.69	0.67
Greeley	2	0.89	19.33	0.00	17.93	0.00	24.16	0.00	38.59	100.00	0.02	0.00	0.00	0.00	0.05
San Miguel	4	1.78	14.57	0.00	10.55	0.00	19.29	0.00	55.59	100.00	1.06	0.00	0.00	0.00	1.52

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 5.8% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2006					Geography: COLORADO			Evaluation Period: JANUARY 1, 2005 TO DECEMBER	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Colorado Springs	300	26.09	66.50	45.33	58.00	15.33	26.67	0.53	0.50
Denver	346	30.09	64.15	41.33	55.49	19.36	25.14	0.13	0.13
Limited Review:									
Boulder MA	43	3.74	66.37	39.53	44.19	25.58	30.23	0.10	0.10
Eagle Garfield Pitkin	311	27.04	66.25	54.66	61.41	15.43	23.15	1.24	1.65
Grand Junction	123	10.70	63.53	52.85	53.66	20.33	26.02	0.75	0.89
Greeley	5	0.43	62.91	60.00	40.00	0.00	60.00	0.01	0.00
San Miguel	22	1.91	65.78	68.18	68.18	18.18	13.64	1.19	2.16

* Based on 2006 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2006).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.61% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: COLORADO									
Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Colorado Springs			60	174	60	174	2.25	0	0
Denver	1	492	36	7,033	37	7,525	97.34	0	0
Limited Review:									
Boulder MA	0	0	0	0	0	0	0.00	0	0
Eagle Garfield Pitkin	0	0	24	16	24	16	.21	0	0
Grand Junction	0	0	6	15	6	15	.20	0	0
Greeley	0	0	0	0	0	0	0.00	0	0
San Miguel	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS 1, 2005 TO DECEMBER 31, 2006								Geography: COLORADO				Evaluation Period: JANUARY					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Colorado Springs	35.54	6	24.00	17.00	17.00	50	16	0	0	0	0	0	0	0.32	25.37	49.82	24.49
Denver	25.38	3	12.00	0.00	33.00	0.00	66	0	0	0	0	0	0	4.56	27.71	40.28	27.32
Limited Review:																	
Boulder MA	2.51	1	4.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.35	25.38	41.56	29.70
Eagle Garfield Pitkin	18.43	7	28.00	0.00	0.00	14.00	86.00	1	0	0	0	0	+1	0.00	0.00	17.80	82.20
Grand Junction	15.20	6	24.00	0.00	17.00	83.00	0.00	1	1	0	-1	+1	0	0.00	17.70	60.49	21.81
Greeley	0.00	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	0	-1	2.21	21.67	49.61	25.28
San Miguel	2.94	2	8.00	0.00	0.00	0.00	100.00	0	1	0	0	-1	0	0.00	0.00	20.28	79.72

Tables of Performance Data

State of Wyoming

Table 1. Lending Volume

LENDING VOLUME												Geography: WYOMING		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006	
MA/Assessment Area (2007):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Cheyenne MSA	21.29	164	23,564	238	22,105	3	380	0	0	411	46,579	42.57			
Limited Review:															
Laramie (Albany County)	29.93	451	54,851	123	15,569	4	76	0	0	578	70,496	12.47			
Casper (Natrona County)	14.19	133	21,092	131	19,512	10	372	0	0	274	40,976	18.47			
Northern Wyoming	34.59	116	9,553	333	39,178	218	15,749	1	3,000	668	68,980	26.49			

* Loan Data as of December 31, 2006. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2006 to December 31, 2006.

*** Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2006			Geography: WYOMING				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Cheyenne MSA	105	16.96	0.00	0.00	23.38	12.38	51.37	47.62	25.25	40.00	1.12	0.00	1.07	0.87	1.62	
Limited Review:																
Laramie (Albany County)	370	59.77	0.25	0.00	11.30	18.11	66.08	67.30	22.37	14.59	13.47	0.00	22.86	13.40	9.13	
Casper (Natrona County)	82	13.25	0.00	0.00	18.11	10.98	59.40	52.44	22.49	36.59	1.06	0.00	0.00	0.97	2.05	
Northern Wyoming	62	10.02	0.00	0.00	4.38	1.61	83.28	77.42	12.34	20.97	1.19	0.00	0.00	1.38	0.77	

* Based on 2006 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2006		Geography: WYOMING								Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31,					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	5	16.67	0.00	0.00	23.38	20.00	51.37	20.00	25.25	60.00	0.30	0.00	1.96	0.00	0.00
Limited Review:															
Laramie (Albany County)	6	20.00	0.25	16.67	11.30	0.00	66.08	66.67	22.37	16.67	3.03	100.00	0.00	2.17	0.00
Casper (Natrona County)	5	16.67	0.00	0.00	18.11	0.00	59.40	100.00	22.49	0.00	0.28	0.00	0.00	0.44	0.00
Northern Wyoming	14	46.67	0.00	0.00	4.38	0.00	83.28	100.00	12.34	0.00	1.85	0.00	0.00	2.47	0.00

* Based on 2006 Peer Mortgage Data (Western)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2006			Geography: WYOMING								Evaluation Period: JANUARY 1, 2005 TO DECEMBER				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	54	25.59	0.00	0.00	23.38	14.81	51.37	48.15	25.25	37.04	0.67	0.00	0.61	0.49	1.05
Limited Review:															
Laramie (Albany County)	73	34.60	0.25	0.00	11.30	5.48	66.08	71.23	22.37	23.29	5.81	0.00	2.13	5.75	7.56
Casper (Natrona County)	46	21.80	0.00	0.00	18.11	8.70	59.40	60.87	22.49	30.43	1.39	0.00	1.47	1.33	1.56
Northern Wyoming	38	18.01	0.00	0.00	4.38	0.00	83.28	81.58	12.34	18.42	0.78	0.00	0.00	0.78	0.86

* Based on 2006 Peer Mortgage Data (Western)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 31, 2006			Geography: WYOMING						Evaluation Period: JANUARY 1, 2005 TO DECEMBER						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	238	28.85	0.00	0.00	40.49	41.60	42.66	37.39	16.85	21.01	3.53	0.00	4.79	2.78	3.68
Limited Review:															
Laramie (Albany County)	123	14.91	3.77	0.00	12.17	17.07	74.02	74.80	10.03	8.13	5.10	0.00	7.09	5.33	3.94
Casper (Natrona County)	131	15.88	0.00	0.00	36.76	25.95	49.24	58.78	14.00	15.27	1.80	0.00	1.43	2.47	1.34
Northern Wyoming	333	40.36	0.00	0.00	4.49	0.00	86.37	89.79	9.13	10.21	2.84	0.00	0.00	3.16	2.89

* Based on 2006 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2006).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WYOMING						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families6	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	105	16.96	17.14	6.80	19.99	21.36	24.55	33.98	38.32	37.86	1.12	0.55	1.02	1.34	1.50
Limited Review:															
Laramie (Albany County)	370	59.77	23.05	8.54	17.68	30.30	21.38	30.03	37.90	31.13	13.47	33.33	28.57	17.33	8.86
Casper (Natrona County)	82	13.25	19.04	6.17	19.09	13.58	23.45	32.10	38.43	48.15	1.06	0.00	0.00	1.34	1.95
Northern Wyoming	62	10.02	18.47	13.56	19.22	20.34	23.81	20.34	38.49	45.76	1.19	2.40	1.33	1.13	1.37

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2006		Geography: WYOMING								Evaluation Period: JANUARY 1, 2005 TO DECEMBER					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total* *	% Famili es***	% BANK Loans****	% Families ⁷	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	5	16.67	17.14	0.00	19.99	0.00	24.55	0.00	38.32	100.00	0.30	0.00	0.00	0.00	0..76
Limited Review:															
Laramie (Albany County)	6	20.00	23.05	0.00	17.68	60.00	21.38	20.00	37.90	20.00	3.03	0.00	7.14	4.76	0.00
Casper (Natrona County)	5	16.67	19.04	0.00	19.09	0.00	23.45	0.00	38.43	100.00	0.28	0.00	0.00	0.00	0.66
Northern Wyoming	14	46.67	18.47	14.29	19.22	50.00	23.81	7.14	38.49	28.57	1.85	3.33	5.00	0.00	2.03

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2006			Geography: WYOMING						Evaluation Period: JANUARY 1, 2005 TO DECEMBER						
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families ⁸	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	54	25.59	17.14	7.69	19.99	13.46	24.55	36.54	38.32	42.31	0.67	0.00	0.40	1.10	0.87
Limited Review:															
Laramie (Albany County)	73	34.60	23.05	7.69	17.68	24.62	21.38	32.31	37.90	35.38	5.81	7.69	7.84	6.25	5.76
Casper (Natrona County)	46	21.80	19.04	4.55	19.09	13.64	23.45	29.55	38.43	52.27	1.39	0.00	0.89	1.54	2.41
Northern Wyoming	38	18.01	18.47	8.57	19.22	28.57	23.81	22.86	38.49	40.00	0.78	1.48	1.34	0.71	0.83

* Based on 2006 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 7.1% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2006				Geography: WYOMING			Evaluation Period: JANUARY 1, 2005 TO DECEMBER		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total*	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Cheyenne MSA	238	28.85	59.19	67.65	78.57	13.87	7.56	3.53	5.05
Limited Review:									
Laramie (Albany County)	123	14.91	59.95	66.67	60.16	24.39	15.45	5.10	6.99
Casper (Natrona County)	131	15.88	60.26	48.85	63.36	19.08	17.56	1.80	1.85
Northern Wyoming	333	40.36	56.70	57.66	67.87	18.62	13.51	2.84	4.06

* Based on 2006 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2006).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.79% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WYOMING				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cheyenne MSA	0	0	24	32	24	32	39.50	0	0
Limited Review:									
Laramie (Albany County)	0	0	11	23	11	23	28.40	0	0
Casper (Natrona County)	0	0	30	13	30	13	16.05	0	0
Northern Wyoming	0	0	40	13	40	13	16.05	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: WYOMING				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2006					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cheyenne MSA	42.57	3	37.50	0.00	33.00	33.00	33.00	0	0	0	0	0	0	0.00	30.33	48.51	21.16
Limited Review:																	
Laramie (Albany County)	12.47	1	12.50	0.00	0.00	0.00	0.00	0	0	0	0	0	0	10.45	12.86	59.31	17.38
Casper (Natrona County)	18.47	1	12.50	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	20.30	56.97	22.73
Northern Wyoming	26.49	3	37.50	0.00	0.00	0.00	0.00	1	0	0	0	+1	0	0.00	4.83	82.86	12.30