

PUBLIC DISCLOSURE

January 19, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Wyoming Bank & Trust Co., N.A.
Charter Number 23594**

**99 South Main Street
Buffalo, Wyoming 82834-0950**

**Comptroller of the Currency
50 Fremont Street, Suite 3900
San Francisco, California 94105**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Wyoming Bank & Trust Co., N.A.**, prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of January 19, 1999. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

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

Wyoming Bank & Trust Co., N.A., satisfactorily meets the credit needs of its community through agricultural, business, home financing, and general purpose consumer loans. The bank also participates in guaranteed home loan programs and agricultural/commercial loan programs through state and federal government agencies.

Our conclusions with respect to the performance criteria are:

- The bank makes a majority of its loans inside its assessment area.
- The bank's lending patterns show a good penetration of loans to individuals of different income levels, as well as to businesses and farms of different sizes.
- The geographic distribution of loans are reasonably dispersed throughout the entire assessment area, including the moderate-income tracts.
- The bank's eight quarter average loan-to-deposit ratio is comparable to similarly situated banks.

DESCRIPTION OF INSTITUTION

Wyoming Bank and Trust Co., N.A., (WBT) is a \$26 million (total assets) bank owned by Sturm Banks of Wyoming, Incorporated. Sturm Banks of Wyoming, Incorporated owns WBT and three other community banks in Wyoming with consolidated assets of \$240 million. The bank is located in the town of Buffalo, Wyoming. The bank has one office and no deposit-taking automated teller machines.

WBT offers a full range of credit products, including: agricultural, commercial, home financing, and general purpose consumer loans. The bank participates in both state and federal government guaranteed loan programs. As of September 30, 1998, the bank's loan portfolio consisted of 56% commercial/agricultural, 18% consumer loans (nonresidential real estate), 11% 1-4 family residential real estate, and 15% other real estate loans. There are no financial or legal impediments to the bank's ability to meet the credit needs of its assessment area. The bank received an outstanding rating at the last CRA examination on August 5, 1996.

DESCRIPTION OF ASSESSMENT AREA

WBT's assessment area (AA) consists of Johnson and Sheridan Counties. This AA meets the legal requirements of the CRA and does not arbitrarily exclude low- or moderate-income geographies. Neither county is in a Metropolitan Statistical Area (MSA). The population of Johnson and Sheridan counties totals 29,707. The two primary towns in the AA are Sheridan and Buffalo. The following table shows the income levels of families residing in the AA.

FAMILY INCOME FOR THE ASSESSMENT AREA		
Income Category*	Number of Families	Percent
Low Income (Less than 50% of Median Income or \$20,950)	1,593	20
Moderate Income (Between 50%-80% of Median Income or \$20,951-\$33,520)	1,782	22
Middle Income (Between 81%-120% of Median Income or \$33,521-\$50,280)	1,997	24
Upper Income (Over 120% of Median Income or \$50,281)	2,808	34
Total	8,180	100

*1997 HUD Adjusted Statewide Non-MSA Median Family Income is \$41,900.

The bank's AA consists of 11 block numbering areas; 2 moderate income, 8 middle income, and 1 upper income. The two moderate income BNA's are located outside of Buffalo. One includes the town of Kaycee at the south end of Johnson County. The other is located 35 miles north in Sheridan, Wyoming, and is served by several other banks. Primary industries in the AA are small farms and small businesses. Farm production is primarily cattle and sheep. Commercial businesses are primarily engaged in retail product sales and services for agriculture and tourism.

WBT operates in a competitive environment in both Buffalo and Sheridan. Each community is served by branches of large banks, several community banks, savings banks, and credit unions. Persons contacted within the community include a real estate agent in the community of Kaycee and the city/county planner for Buffalo and Johnson County. Both contacts stated that community credit needs are basic loan products and stated they believed local banks are responsive.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

To assess the bank's performance in the following areas, we selected a sample of all commercial/agricultural loans originated between May 1, 1998, and November 30, 1998. We also reviewed all auto loan originations from August 1, 1998, to November 30, 1998. This amounted to 41 commercial/agricultural loans and 56 auto loans totaling \$1,766,448 and \$679,249 respectively.

Lending Inside the Assessment Area

WBT's record of lending in the assessment area meets the standards for satisfactory performance. Using the sample described above, we calculated the number and dollar volume of loans originated inside the AA. The lower percentage by dollar volume of commercial loans originated in the AA is due to several large loan participations purchased from affiliated banks.

RECORD OF LENDING IN THE ASSESSMENT AREA				
Loan Type	Number and Percent of Loans Originated Inside AA		Dollar Volume and Percent of Loans Originated Inside AA	
Commercial & Agricultural	38	93%	\$1,006,482	57%
Auto	46	82%	\$ 567,751	84%

Distribution of Loans by Borrower Income or Business Revenue

WBT’s lending record satisfactorily reflects the demographics of the AA’s businesses and consumers. The credit products offered by the bank are consistent with the credit needs identified by the community contacts. Seventy-eight percent of businesses in the AA generate revenues less than \$1 million. Our sample of commercial and agricultural loans found that 84% of the loans were to entities with revenues less than \$1 million. The table below provides further detail on the business revenues of bank loan customers.

DISTRIBUTION OF COMMERCIAL AND AGRICULTURAL LOANS BY REVENUE (Originated 12/01/97-11/30/98)		
Business Size by Revenue	Commercial & Agricultural Loans (Number/Percent)	
Revenue Greater Than \$1,000,000	6	16%
Revenue Greater Than \$500,000 but Less Than \$1,000,000	5	13%
Revenue Greater Than \$250,000 but Less Than \$500,000	7	18%
Revenue Greater Than \$100,000 but Less Than \$250,000	3	8%
Revenue Less Than \$100,000	17	45%
Total	38	100%

The bank’s lending distribution by borrower income for auto loans is good. During the period shown in the table below, WBT originated loans across all income categories, including low and moderate income applicants.

DISTRIBUTION OF AUTO LOANS TO BORROWERS BY INCOME LEVEL (Originated 08/01/98-11/30/98)		
Income Category	Percent of Families in AA	Percent of Auto Loans (by Number)
Low Income	20	35
Moderate Income	22	33
Middle Income	24	17
Upper Income	34	15
Total	100	100

Distribution of Loans Geographically

The bank's loans are reasonably dispersed throughout the AA. The bank's lower percentage of lending in the moderate-income tracts is expected because of the remote location of the Kaycee BNA and the strong local competition in the Sheridan BNA.

GEOGRAPHIC DISTRIBUTION OF LOAN ORIGINATIONS			
Income Category of Tract	Percent of Total Tracts in AA	Percent of Population	Percent by Number of Loans Originated
Low Income	0	0	0
Moderate Income	18	13	9
Middle Income	73	73	85
Upper Income	9	14	6
Total	100	100	100

Loan-to-Deposit Ratio

WBT's loan-to-deposit ratio is in line with similarly situated banks. We reviewed the loan-to-deposit ratios of six other banks located in northern Wyoming with similar community demographics and business focus. WBT's eight quarter average ratio of 73% ranked third out of the six banks. The other banks' ratios ranged from 49% to 75%.

Response to Complaints

No complaints have been received regarding the bank's CRA performance since the last CRA Performance Evaluation dated August 5, 1996.

Record of Compliance with Antidiscrimination Laws

Our fair lending review did not find any evidence of discrimination or practices intended to discourage applicants from applying for credit.