



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

March 13, 2000

Community Reinvestment Act Performance Evaluation

Wells Fargo Bank Wyoming, National Association
Charter Number: 10533

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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

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

*This document is an evaluation of the CRA performance of **Wells Fargo Bank Wyoming, National Association**, prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 13, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

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

Median Family Income (MFI) - The median income determined by the United States Census Bureau every 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

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

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

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

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

Overall CRA Rating

Institution's CRA Rating: This institution is rated "Satisfactory."

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

Performance Levels	Wells Fargo Bank Wyoming, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory		X	
Low Satisfactory	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:

- A good responsiveness to identified community credit needs.
- An adequate geographic and borrower distribution of lending in each full-scope assessment area.
- A positive level of community development lending in the Casper MSA.
- A good level of community development investments in its assessment areas.
- An excellent distribution of retail services and a good level of community development services.

Description of Institution

Wells Fargo Bank Wyoming, National Association (WFWY), an intrastate bank, is headquartered in Casper, Wyoming, and does business through a system of nine branch offices in three assessment areas in the eastern part of Wyoming. WFWY was formerly known as Norwest Bank Wyoming, NA. Wells Fargo & Company changed the name of the bank in August 2000. In addition to the Casper MSA, WFWY has offices in the Cheyenne MSA and in Rural Wyoming.

WFWY is a subsidiary of Wells Fargo & Company (WFC), San Francisco, California, a multi-bank holding company. WFC recently merged with Norwest Corporation, formerly headquartered in Minneapolis, Minnesota. WFC has total assets in excess of \$200 billion and conducts business through nearly 3,000 offices and over 6,000 ATMs in 21 states.

As of December 31, 1999, WFWY has total assets of approximately \$1.7 billion, and total deposits of about \$1.1 billion. According to information provided by bank management, approximately \$760 million of the total deposits consist of deposits placed in the Casper office by a holding company affiliate company. Loans, net of allowances for losses, total approximately \$674 million, equating to about 39% of total assets and about 58% of total deposits (including the inter-company deposits that are not derived from the local community). WFWY has a total Tier I capital base of approximately \$174 million.

At the request of WFWY and in accordance with provisions of the CRA, this evaluation considers lending activities of the bank's affiliates, Wells Fargo Home Mortgage, Inc., Wells Fargo Funding, Inc., and Norwest Home Improvement, Inc.

WFWY is a full service bank offering a typical array of retail banking services and loan products. Its business strategy is in no way limited or specialized to any narrow field of endeavor. Through the bank's affiliate, Wells Fargo Home Mortgage, borrowers can obtain home purchase and refinance lending that is sometimes not available through other commercial banks.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its assessment areas.

WFWY was rated "Satisfactory" at the previous CRA performance evaluation dated October 9, 1997.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation included a review of the bank's home-mortgage, small business, small farm, and community development lending; community development investments; and retail and community development services. In accordance with OCC policy, home-mortgage, small business, and small farm lending was evaluated for the calendar years 1997, 1998, and 1999. All other products and activities were evaluated for the period beginning at the date of the previous CRA public evaluation and concluding March 13, 2000.

Data Integrity

In association with this review, small business and small farm data submitted by the bank in compliance with requirements of the CRA and utilized for analysis were reviewed for accuracy using a selected sample. This activity revealed no significant errors in reporting. Some minor errors were detected and corrected for analysis purposes. The accuracy of home mortgage data was reviewed utilizing reports and working papers of the bank's internal auditors as well as a review of a sample of loan applications. The home mortgage, small business and small farm data were determined to be accurate and useful for analysis.

Selection of Areas for Full-Scope Review

WFWY has established three assessment areas (AAs), Casper MSA, Cheyenne MSA, and Rural Wyoming. All three AAs were selected for full-scope review.

Other

Community contacts with interested parties in several of WFWY's AAs were reviewed. Identified credit needs included primarily affordable housing and small business credit, including start-up and expansion loans. There were no significant adverse comments regarding the bank's performance.

Fair Lending Review

An analysis of 1998 HMDA, Small Business, and Small Farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk based fair lending approach. The analysis of this data revealed no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1997.

Conclusions:

- There is no evidence of any violations of the substantive provisions of the anti-discrimination laws and regulations.
- Wells Fargo and Company has a satisfactory process in place, including training, to help ensure corporate-wide ongoing compliance with fair lending laws.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance is adequate in the Casper MSA, Cheyenne MSA, and Rural Wyoming AAs.

Lending Activity

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

WFWY's overall lending activity reflects a good responsiveness to the identified credit needs of its communities. Such needs identified affordable housing (both construction and permanent financing) as the primary credit need throughout its Wyoming AAs. During the evaluation period, WFWY originated over 8,000 loans for home mortgage (home purchase, home improvement and home refinancing), small business, or small farm loans totaling nearly \$600 million. Within these loan categories, home mortgage lending represented a significant 83% of the activity, followed by small loans to businesses at 14% and small loans to farms at 3%. And, within the home mortgage loan category, 46% was with home purchase loans and 42% with refinance loans. The bank also originated 13 loans totaling \$1.8 million for CD purposes.

The bank's deposit gatherings from the Casper MSA, Rural Wyoming and Cheyenne MSA were 78%, 13%, and 9% respectively. However, when adjusted for the intra-company deposits described earlier, these percentages approximate 28%, 42%, and 30%. On a deposit market share basis, WFWY ranks third in each of its full-scope AAs, while in home mortgage lending, it ranks first in virtually all home mortgage products in each full-scope AA (except home refinance in Rural Wyoming where it ranks second). In small loans to businesses, the bank ranks first in the Casper MSA, fourth in the Cheyenne MSA, and seventh in the Rural Wyoming AA. In small loans to farms, the bank ranks second in the Casper MSA, first in the Cheyenne MSA, and third in the Rural Wyoming AA.

We placed greater weight on home mortgage lending (specifically home purchase) versus small loans to businesses/farms. This is largely based on the previously identified credit needs of WFWY's AAs, coupled with the bank's lending focus.

It is noted that WFWY's proportion of lending was generally comparable to the proportion of adjusted deposit gatherings from its AAs. The proportion of total reportable lending for Casper MSA, Cheyenne MSA, and Rural Wyoming, respectively, are 36%, 30%, and 34%.

Distribution of Loans by Income Level of the Geography

WFWY's overall geographic distribution of lending is adequate. The geographic distribution of home lending is adequate in each AA. The distribution of small loans to businesses is good in the Casper and Cheyenne MSAs but excellent in the Rural Wyoming AA. The distribution of small loans to farms is good in the Rural Wyoming AA. Due to the small volume of small farm lending in the Casper and Cheyenne MSAs, no conclusion is rendered. We based our conclusions primarily upon the bank's lending distribution compared to area demographics. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

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

Home Purchase Loans

WFWY's geographic distribution of home purchase loans is adequate in the Casper and Cheyenne MSAs, and good in the Rural Wyoming AA. In the Casper MSA, the bank's loan distribution to low-income areas is below the percentage of owner-occupied units, although its respective market share exceeds its overall market share. In moderate-income areas, the loan distribution was also below the proportion of owner-occupied units. The bank's respective market share there was modestly lower than its overall market share. In the Cheyenne MSA, WFWY's loan distribution to moderate-income areas was below the percentage of owner-occupied units. The bank's market share of this geographic segment was also below its overall market share. There are no low-income geographies in the Cheyenne MSA.

WFWY's distribution in the Rural Wyoming AA is excellent. In low-income areas, the lack of available lending opportunities precludes any meaningful analysis. In moderate-income areas, the bank's percentage of loans there matched the percentage of owner-occupied units and its market share of these geographies exceeded its overall market share.

Home Improvement Loans

WFWY's geographic distribution of home improvement loans is adequate in the Casper MSA, excellent in the Cheyenne MSA, and poor in the Rural Wyoming AA. In the Casper MSA, the bank's lending in low-income areas is below the percentage of owner-occupied housing there and its market share of low-income areas is only half its overall market share. In moderate-income areas, the bank's loan distribution is near to the percentage of owner-occupied units. And, its market share of loans made in moderate-income areas comes moderately close to its overall market share.

The bank's loan distribution in the Cheyenne MSA is excellent. Its percentage of loans in moderate-income areas is near to the percentage of owner-occupied units there (there are no low-income areas in this AA). Also, its market share of moderate-income area lending exceeds its overall market share. The loan distribution in the Rural Wyoming AA is poor.

For low-income areas, the lack of available lending opportunities precludes any meaningful analysis. In moderate-income areas, the bank's percentage of loans was significantly below demographics and its market share of loans made in moderate-income areas was below its overall market share. WFWY made only 3% of its home improvement loans in these moderate-income areas. This level is somewhat mitigated by the low level of applications and lending that was generated by all reporting lenders. In 1998, only 34 loans were made in moderate-income areas as reported by lenders. Further, this geography is sparsely populated.

Refinance Loans

WFWY's geographic distribution of home refinance loans is poor in the Casper MSA and Rural Wyoming AAs and adequate in the Cheyenne MSA. In the Casper MSA, the bank's distribution to low-income areas was below demographics and its respective market share was below its overall market share. In moderate-income areas, the bank's distribution was below demographics, although its respective market share matched its overall market share. In the Rural Wyoming AA, the bank's distribution in moderate-income areas was below demographics. The bank's market share there was also below its overall market share. Again, there are nominal lending opportunities available in low-income areas to render any meaningful conclusions with this component. In the Cheyenne MSA, the bank's loan distribution was adequate. Its percentage of loans to moderate-income areas was much closer to the percentage of owner-occupied units there. Also, the bank's market share of this component nearly matched its overall market share. Again, there are no low-income geographies in the Cheyenne MSA.

Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

WFWY's overall geographic distribution of small loans to businesses is good. In the Casper MSA, the bank's distribution was good as its percentage of loans made in both LMI areas was near to the percentage of businesses located there. The bank's market share of loans in low-income areas also matched its overall market share and came close to matching for moderate-income areas. In the Cheyenne MSA, the bank's distribution was good. Its percentage of loans in moderate-income areas matched the percentage of businesses there and its market share of loans in moderate-income areas exceeded its overall market share. There are no low-income geographies in the Cheyenne MSA. In the Rural Wyoming AA, WFWY achieved an excellent distribution. Its percentage of loans to small businesses in low-income areas significantly exceeded the percentage of businesses there, although it is noted that only 1% of the businesses are located there. The bank's market share of low-income areas was also significantly higher than its overall market share. In moderate-income areas, the bank's distribution matched the percentage of businesses there, however its respective market share was well below its overall market share.

Small Loans to Farms

Refer to Table 6 in Appendix C for facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Lending to farms is not a significant line of business for WFWY. In their Wyoming AAs during the three year evaluation period, the bank made only 19 loans in the Casper MSA and 78 in the Cheyenne MSA. Accordingly, no conclusions are drawn in these two AAs. In the Rural Wyoming AA where 126 such loans were made, loan distribution was good. There, the bank's percentage of lending in moderate-income areas came close to the percentage of farms located there. The bank's respective market share was well above its overall market share. There is an insufficient level of farms in low-income geographies to render any meaningful conclusions.

Lending Gap Analysis

This evaluation included an analysis of lending gaps in each of WFWY's AAs. Although there were several geographies where very few or no loans were made, the gaps were mostly a result of limited opportunities due to either the small population, few owner-occupied homes or a limited number of businesses. Overall, there were no unexplained gaps in the bank's lending or other factors that would reflect negatively on its performance in each AA.

Inside/Outside Ratio

A substantial amount of WFWY's lending activity is done within its AAs. During the evaluation period, 94% of the bank's HMDA, small business, and small farm loans were originated within AAs.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of home mortgage loans and small loans to businesses and farms is adequate. Borrower distribution of home lending is good in the Casper MSA and adequate in the Cheyenne MSA and Rural Wyoming AA. The distribution of small loans to businesses is good in each AA. The distribution of small loans to farms is good in the Rural Wyoming AA, and no conclusion is rendered on the Casper and Cheyenne MSAs due to the limited volume of lending. We based our conclusions primarily upon the bank's lending to borrowers of different income levels compared to the population demographics of the area. The demographic comparison was then supplemented by a market share analysis.

Home Mortgage Loans

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

Home Purchase Loans

The borrower distribution of home purchase loans is good in the Casper MSA and adequate in the Cheyenne MSA and Rural Wyoming AAs. In the Casper MSA, the percentage of the bank's loans to low-income borrowers is below the percentage of low-income families there, however its respective market share matches its overall market share. In the Cheyenne MSA, the percentage of loans to low-income borrowers is below demographics, although its respective market share is moderately close to its overall market share. For moderate-income borrowers, the bank's distribution significantly exceeds demographics and its respective market share matches its overall market share. A somewhat comparable profile, and thus conclusion, is noted with the Rural Wyoming AA.

Home Improvement Loans

WFWY's borrower distribution for home improvement loans is adequate in the Casper MSA, and poor in the Cheyenne MSA and Rural Wyoming AAs. In the Casper MSA, the bank's percentage of loans made to low-income families is below the percentage of low-income families, however the percentage of loans to moderate-income families matches demographics. The bank's market share of loans to LMI families is below its overall market share. In the Cheyenne MSA, the bank's percentage of loans to low-income borrowers is well below demographics, although its lending compares more favorably for moderate-income borrowers. The bank's market share was nominal for low-income families although better for moderate-income families. In the Rural Wyoming AA, the bank's percentage of loans to low-income families is also well below the percentage of such families, although that is not the case for moderate-income borrowers. The bank's market share for low-income families is well below its overall market share, however for moderate-income families, its market share comes close to its overall market share.

Home Refinance Loans

The borrower distribution of home refinance loans is adequate in each full-scope AA. In each full-scope AA, the percentages of loans to low-income borrowers are well below the percentage of those families, although to moderate-income borrowers the distribution is much better. The market share for low-income borrowers also significantly exceeds the overall share. The same market share profile is reflected for moderate-income borrowers, except in the Casper MSA and Rural Wyoming AAs where such market shares were modestly less than the respective overall market shares.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The bank's overall distribution of small loans to businesses is good. In the Casper MSA, distribution is good. The bank's percentage of small loans to businesses with annual

revenues of \$1 million or less nearly matched the percentage of such businesses in this market. Also, the bank's market share for loans to these smaller businesses is greater than its overall market share. The distribution of business loans in the Cheyenne MSA is good.

The bank's percentage of loans to businesses with revenues of \$1 million or less per annum is close to the percentage of such businesses in the market. In addition, the market share of loans to these businesses exceeds its overall market share. In the Rural Wyoming AA, the distribution of loans is good. The bank's percentage of loans to such businesses matches the percentage of businesses there and its respective market share of loans to these businesses is close to its overall market share.

Small Loans to Farms

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

As previously stated, the bank is not active in the small loan to farm component in at least two of the three full-scope AAs (Casper and Cheyenne MSAs). Accordingly, the nominal level of farm loans made by the bank precludes any meaningful conclusions for these AAs. In the Rural Wyoming AA, performance is good. There, the bank made 123 loans over the three year evaluation period. Of this activity, the percentage to farms with annual revenues less than \$1 million matched the percentage of such farms. The market share of lending to such farms also matched the bank's overall market share.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

WFY's CD loan activity had a positive impact on the bank's overall Lending Test performance in the Casper MSA, and a neutral impact in the Cheyenne MSA and Rural Wyoming AAs.

During the evaluation period, the bank originated nine loans totaling \$1.3 million in the Casper MSA and four loans totaling \$500 thousand in the Rural Wyoming AA. All but one of these loans provided direct benefits to LMI individuals with affordable housing units, either at the construction or permanent financing stage. One loan helped fund operational expenses for an organization that provides food and shelter for the homeless. There were no loans made in the Cheyenne MSA during this evaluation period.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test for each full-scope AA.

WFY uses flexible underwriting products to address the credit needs of both LMI persons and geographies. The bank's Community Home Affordable Mortgage Program (CHAMP),

previously known as the Community Home Ownership Program, provides first mortgage assistance through a mortgage product and home ownership counseling. The first mortgage product includes flexible underwriting criteria, such as a three percent down payment and no private mortgage insurance. During the evaluation period, the bank made 41 home purchase loans totaling about \$2.9 million under this program.

The bank's affiliate, Wells Fargo Home Mortgage, also provided 28 loans for \$2.4 million under the Farmer's Home, Rural Economic Community Development Services (RECDS) loan program. This program provides housing loans on rural properties to families earning less than the median income. The bank also provides a variety of Small Business Administration loan products, through which it made 51 loans totaling \$6.6 million.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Casper MSA, Cheyenne MSA, and Rural Wyoming AA is good.

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

During the evaluation period, WFWY made 37 qualified community development investments totaling \$3.6 million. This is a good level of activity as previously the bank had made a nominal level of investments. The level of activity also compares favorably to the limited opportunities in the bank's sparsely populated assessment areas. To assist in gauging the relative volume of investments, we calculated their relationship to Tier 1 capital. The bank's community development investment activity accounts for two percent of the bank's Tier 1 Capital over the evaluation period.

In the Casper MSA, WFWY made 16 qualified investments totaling \$1.2 million. The majority of this consists of a \$1 million investment in securities financing 151 units of affordable rental housing for LMI persons. The remainder consists of the MSA's allocated portion of LIHTCs and LMI-mortgage-backed securities and various qualified grants and donations. The mortgage-backed securities were purchased by WFWY's affiliate Wells Fargo Bank Minnesota. The portion of securities that were supported by LMI-mortgages in Wyoming was allocated to WFWY for CRA consideration. The allocated portion was not considered in any other affiliate's CRA performance.

In the Cheyenne MSA and the Rural Wyoming AA, WFWY invested in qualified LIHTCs and LMI-mortgage-backed securities and has made qualified donations and grants. The mortgage-backed securities were purchased by WFWY's affiliate Wells Fargo Bank Minnesota. Again, the portion of securities that were supported by LMI-mortgages in Wyoming was allocated to WFWY for CRA consideration. The allocated portion was not considered in any other affiliate's CRA performance. These aggregate \$291 thousand in Cheyenne and \$2 million in Rural Wyoming.

Throughout Wyoming, the investments are not innovative, however, they are responsive to identified needs. The grants and contributions support primarily community services for LMI individuals.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

WFWY's performance under the Service Test is rated Outstanding. Based on full-scope reviews completed in all three AAs, the bank's performance in all three AAs is excellent.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

WFWY's delivery systems through its branch and ATM network are accessible to essentially all portions of its AAs. In general, the distribution of the branches in LMI areas exceeds the percent of the population residing in those areas.

In the Casper AA, the distribution of the bank's branches is excellent. The bank's distribution of branches in both low- and moderate-income geographies significantly exceeds the percentage of the population residing in those geographies. The distribution of the bank's ATMs is consistent with the distribution noted in the branches.

The distribution of branches in the Cheyenne AA is excellent. The percent of branches located in moderate-income geographies significantly exceeds the percent of the population living in those AAs. There are no low-income geographies in this AA. The bank has only one ATM in this AA and that is located in a high-income area.

In the Rural Wyoming AA, the distribution of the bank's branches is also excellent. The percent of the bank's branches located in moderate-income geographies significantly exceeds the percent of the population residing in those geographies. The bank does not have a branch located in a low-income geography. However, only a very small percentage of the population resides in the low-income geography. The bank has one ATM located in a middle-income geography.

Branch activity in the three AAs during the evaluation was minimal. During this period, the bank opened two branches in the Rural Wyoming AA, with one of these in a moderate-income area. There were no branch closings during the evaluation period.

The bank's business hours are reasonable and are generally structured to accommodate customer needs. There were no major inconsistencies between branches in this regard.

WFWY offers a wide array of products and services through many of its branch locations. WFWY provides or administers products directed toward LMI individuals that include, but are not limited to, an affordable home loan product, a savings account that features matching federal funds, and direct-deposit accounts for the homeless that feature innovative/flexible services. Its alternative delivery systems include, but are not limited to, telephone banking, bank by mail and on-line banking that are available to all. Although

these alternative delivery systems are of potential benefit to persons across all income levels, there is no information available to demonstrate the actual benefits gained by any group of persons, and these services have been considered accordingly in this evaluation.

Community Development Services

WFWY provides a good level of community development services to its community. During the evaluation period, the bank provided over 70 community development services to its community. The following highlights a few of the community development services targeted to LMI persons that are provided by the bank.

- **Tribal Code Development Task Force** - WFWY participated on this multi-bank task force to develop a uniform commercial code for use on reservations in Wyoming.
- **Federal Home Loan Bank Affordable Housing Programs** - As a member, WFWY participates in affordable housing programs which provides subsidies to non-profit organizations to support affordable housing to LMI persons. The bank processes loan applications, monitors its progress and handles funding efforts for the program. During the evaluation period, WFWY assisted in securing five FHLB grants totaling \$287,000.
- **Wells Fargo Adult Credit Education Program** - Wells Fargo uses this program to teach the basics of budgeting, banking, and lending to its communities. In addition, MWWY customized this training for use in Reservations in Wyoming.
- **Native American Development Corporation** - an officer of the bank serves on the Revolving Loan Fund Committee of this corporation. The corporation provides gap financing to businesses located on or near Indian reservations in Montana.

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 nonmetropolitan 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: January 1, 1997 to December 31, 1999 CD Lending August 8, 1997 to March 13, 2000 Investment Test: August 8, 1997 to March 13, 2000 Service Test: August 8, 1997 to March 13, 2000	
Financial Institution		Products Reviewed
Wells Fargo Bank Wyoming, National Association (WFWY) Casper, WY		Small Business Lending; Small Farm Lending; Community Development Lending, Investments, Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
Wells Fargo Home Mortgage Corporation	Holding Company Subsidiary	Home purchase and refinance mortgage loans
Wells Fargo Funding, Inc.	Holding Company Subsidiary	Home purchase and refinance mortgage loans
Norwest Home Improvement, Inc.	Holding Company Subsidiary	Home improvement loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Casper MSA # 1350 Cheyenne MSA # 1580 Rural Wyoming	Full-Scope Full-Scope Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Casper MSA # 1350	B-2
Cheyenne MSA # 1580	B-3
Rural Wyoming	B-4

Casper MSA # 1350

Demographic Information for Full-Scope Area: Casper MSA # 1350						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	11	21	53	16	0
Population by Geography	61,226	5	12	49	34	0
Owner-Occupied Housing by Geography	16,416	4	13	49	33	0
Businesses by Geography	3,616	27	14	39	20	0
Farms by Geography	85	12	12	38	39	0
Family Distribution by Income Level	16,799	20	18	24	37	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,395	9	18	50	23	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$32,469 = \$42,300 = 12.00%	Median Housing Value Unemployment Rate				= \$52,279 = 4.41%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 199X HUD updated MFI.

The Casper MSA is comprised of Natrona County. WFWY obtains the majority, nearly 80%, of its deposits from this AA, however approximately 89% of those deposits are generated from outside the AA through intra-company deposits within Wells Fargo & Company. Adjusting for the deposits not generated within the community, the percentage of deposits coming from the Casper MSA is approximately 28%. The bank made approximately 36% of its reportable loans in this AA during the evaluation period. This AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas. WFWY is the largest bank in the AA with 64% of the insured deposits. Adjusted for the out-of-area deposits described above, this figure drops to about 16% and puts WFWY only slightly larger than its two nearest competitors, Hilltop National Bank and First Interstate Bank, each of which garners about 14% of the deposits in the AA. WFWY operates three branches and four ATMs in the AA.

The Casper MSA is the second largest community in Wyoming, one of the most sparsely populated states. The economy is historically dependent upon mining/oil/gas, and recent price increases have tended to stabilize this industry. At the same time, the economy has become more dependent upon services and, secondarily, tourism. The largest employer is the Wyoming Medical Center. Despite some additional job development, a trend of population decline has continued for several years as younger people, especially, have departed for more prosperous areas, usually in other states. Casper enjoys a low cost of living and low business costs, and housing is more affordable than average.

Cheyenne MSA # 1580

Demographic Information for Full-Scope Area: Cheyenne MSA # 1580						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0	39	39	22	0
Population by Geography	73,142	0	35	44	21	0
Owner-Occupied Housing by Geography	18,407	0	29	47	24	0
Businesses by Geography	3,221	0	53	33	14	0
Farms by Geography	137	0	48	18	34	0
Family Distribution by Income Level	20,127	19	19	24	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,616	0	50	38	12	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$32,587 = \$43,800 = 10.69%	Median Housing Value Unemployment Rate				= \$69,209 = 4.27%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Cheyenne MSA is comprised of Laramie County. WFWY garners approximately 30% of its deposits (excluding the intra-company deposits described above) from this AA and made about 30% of its reportable loans here during the evaluation period. This AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas. WFWY is the third largest bank in the AA, ranking behind Community First National Bank and American National Bank of Cheyenne. Combined, those banks control approximately 42% of the insured deposits in the AA, while WFWY has around 16%. WFWY operates two offices and one ATM in the AA.

Cheyenne is the capital of Wyoming and its largest city, despite a population of less than 75 thousand. Its largest employers are the Warren Air Force Base and United Medical Center. Total state government employment is in excess of 3,500, with local and federal government accounting for another 8,000 jobs. Construction and service industries have expanded, and the unemployment rate is reportedly reduced to approximately 3%. The MSA's housing costs are reasonable. Although the population has been stable, some growth may begin as the tight job market entices in-migration. Some sources predict Cheyenne will also soon benefit from new high-tech jobs resulting from the expansion of the high-tech industry in Colorado.

Rural Wyoming

Demographic Information for Full-Scope Area: Rural Wyoming						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	61	3	16	61	15	5
Population by Geography	141,573	2	16	61	19	1
Owner-Occupied Housing by Geography	34,053	1	14	66	19	0
Businesses by Geography	7,167	1	19	67	13	0
Farms by Geography	606	1	13	75	11	0
Family Distribution by Income Level	36,876	21	17	24	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,166	3	23	63	10	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$32,096 = \$42,800 = 9.27%	Median Housing Value Unemployment Rate				= \$60,917 = 6.68%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Rural Wyoming assessment area consists of Albany, Campbell, Carbon, Converse, Crook, Fremont, Platte, and Weston Counties. WFWY generates approximately 42% of its deposits (excluding the intra-company deposits described above) from this area and made approximately 34% of its reportable loans here during the evaluation period. This AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas. WFWY is the third largest bank in the AA, ranking behind First Interstate Bank and Community First National Bank. Those banks, combined, hold approximately 36% of the insured deposits in the AA, while WFWY has about 9%. WFWY operates four offices and one ATM in this AA.

The attraction of high-tech and other high-growth industries in other parts of the country, particularly in neighboring Colorado, has resulted in stagnant population growth in Wyoming in recent years, with a population decline in some years. Government and services are the largest employment sectors in Wyoming where there are approximately 58,000 local, state, and federal government jobs. The largest employer in the state is the Warren Air Force Base in Cheyenne. Both business and living costs are relatively low in Wyoming.

Appendix C: Tables of Performance Data

Content of Standardized 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME		Evaluation Period: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	% of Rating Area Deposits in AA*	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Casper MSA	78	2,208	141,720	675	46,149	19	1,711	9	1,300	2,911	190,880	36
Cheyenne MSA	9	2,141	175,423	213	23,075	78	3,790	0	0	2,432	202,288	30
Rural Wyoming	13	2,400	149,652	223	14,916	123	7,821	4	500	2,750	172,889	34

* Deposit Data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Casper MSA	4	2	13	8	49	44	33	46	1	21.2	30.0	18.8	17.8	25.5	1,012	33
Cheyenne MSA	0	0	29	18	47	50	24	32	1	15.4	0.0	12.6	15.8	16.7	1,038	34
Rural Wyoming	1	<1	14	14	66	62	19	24	1	15.1	<1	22.3	17.0	10.4	1,031	33

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1997 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Improvement Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Casper MSA	4	2	13	12	49	48	33	38	1	27.6	13.3	24.2	25.0	37.2	254	32
Cheyenne MSA	0	0	29	25	47	45	24	30	1	19.3	0.0	24.3	18.6	17.0	208	26
Rural Wyoming	1	1	14	3	66	46	19	50	1	28.0	50.0	15.6	21.3	39.5	326	41

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1997 TO 12/31/1999						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Casper MSA	4	1	13	8	49	43	33	48	1	24.3	19.4	23.9	23.3	25.5	936	33
Cheyenne MSA	0	0	29	18	47	45	24	38	1	14.3	0.0	13.5	13.1	16.5	890	31
Rural Wyoming	1	<1	14	5	66	52	19	43	2	16.6	12.5	10.4	14.5	22.1	1,042	36

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Casper MSA	27	22	14	11	39	44	20	23	1	30.1	30.9	27.0	32.7	22.2	675	61
Cheyenne MSA	0	0	53	53	33	29	14	18	4	13.5	0.0	16.1	11.6	11.3	213	19
Rural Wyoming	1	1	19	19	67	52	13	27	7	3.3	22.2	0.9	3.5	4.3	223	20

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Loans Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Casper MSA	12	5	12	26	38	63	39	5	2	16.7	0.0	25.0	10.0	0.0	19	9
Cheyenne MSA	0	0	48	28	18	13	34	59	1	34.2	0.0	11.9	50.0	72.0	78	35
Rural Wyoming	1	11	13	11	75	66	11	12	3	4.7	20.0	7.2	3.8	1.3	123	56

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AA as a % of all Small Farm loans in the rating area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*					Total Home Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Casper MSA	20	10	18	21	24	27	37	41	1	21.2	20.5	18.0	23.6	32.6	1,012	33
Cheyenne MSA	19	6	19	29	24	29	38	35	1	15.4	13.4	15.6	18.3	22.0	1,038	34
Rural Wyoming	21	7	17	23	24	32	38	38	1	15.1	13.3	19.2	19.0	18.7	1,031	33

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1997 TO 12/31/1999																
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*					Total Home Improvement Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Casper MSA	20	7	18	18	24	26	37	46	1	27.6	20.0	20.8	20.7	37.4	254	32
Cheyenne MSA	19	4	19	15	24	25	38	52	1	19.3	0.0	14.1	15.3	23.2	208	26
Rural Wyoming	21	4	17	11	24	25	38	58	1	28.0	12.1	25.0	20.1	39.8	326	41

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1997 TO 12/31/1999						
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*					Total Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Casper MSA	20	7	18	13	24	22	37	49	1	24.3	31.5	21.3	20.2	32.0	936	33
Cheyenne MSA	19	5	19	13	24	28	38	43	1	14.3	26.7	17.3	16.9	17.1	890	31
Rural Wyoming	21	4	17	12	24	23	38	50	2	16.6	17.9	14.1	15.7	21.0	1,042	36

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS										
Evaluation Period: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount Regardless of Business Size			Market Share*		Total Small Business Loans	
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Casper MSA	73	71	65	84	11	5	28.9	30.5	675	61
Cheyenne MSA	70	61	60	72	16	12	13.3	14.4	213	19
Rural Wyoming	74	74	87	87	8	5	2.6	2.2	223	20

* The market consists of all other Small Business reporters in the bank's assessment area and is based on 1998 Aggregate Small Business Data only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 6.0% of small loans to businesses reported by the bank.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM										
Evaluation Period: 01/01/1997 TO 12/31/1999										
MSA/Assessment Area	Businesses With Revenues of \$ 1million or less			% Distribution Loans by Original Amount Regardless of Farm Size			Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	% Market Loans*	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Casper MSA	94	84	99	74	26	0	16.7	13.0	19	9
Cheyenne MSA	93	95	83	91	6	3	34.2	34.9	78	35
Rural Wyoming	96	96	98	79	17	4	4.5	4.5	123	56

* The market consists of all other Small Farm reporters in the bank's assessment area and is based on 1998 Aggregate Small Farm Data only

** Farms with revenues of \$1 million or less as a percentage of all farms

*** Loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 1.4% of small loans to businesses reported by the bank.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period: 08/08/97 to 03/13/00							
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Scope:									
Casper MSA	0	0	16	1,236	16	1,236	34.23	0	0
Cheyenne MSA	0	0	11	291	11	291	8.06	0	0
Rural Wyoming	0	0	10	2,084	10	2,084	57.71	0	0

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

** "Unfunded Commitments" means legally binding investment commitments that are tacked and reported by the bank's financial reporting system.

Table 13. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM																	
Evaluation Period: 8/8/97 TO 3/13/00																	
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings				% of the Population with Each Geography*			
				Low (%)	Mod (%)	Mid (%)	Upp (%)			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Casper MSA	78	3	33	33	33	0	33	0	0	0	0	0	0	5	12	49	34
Cheyenne MSA	9	2	22	0	50	50	0	0	0	0	0	0	0	0	35	44	21
Rural Wyoming	13	4	44	0	25	75	0	0	2	0	+1	+1	0	2	16	61	19

* The percentage of the population in the MSA/AA that resides in these geographies.