



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 24, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American National Bank
Charter Number: 15383

3033 E. First Avenue
Denver, CO 80206-5617

Office of the Comptroller of the Currency

NORTHERN COLORADO Field Office
1225 17th Street Suite 450
Denver, CO. 80202-5534

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.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	9
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
COLORADO STATE RATING	11
WYOMING STATE RATING	21
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF STATE RATINGS	B-1
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

Overall CRA Rating

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

The following table indicates the performance level of **American National Bank (ANB)** with respect to the lending, investment, and service tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
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:

- American National Bank’s lending levels demonstrate good responsiveness to the credit needs of the bank’s assessment areas (AAs) receiving full scope reviews.
- The geographic distribution of home mortgage loans is adequate and 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 and to businesses of different sizes is good.
- ANB provided \$6 million in community development (CD) loans in its AAs. This level of CD lending had a neutral impact on the bank’s lending performance.
- ANB demonstrated good performance in providing qualified CD investments and donations. In its full-scope Colorado AAs, it is excellent; in its Wyoming full-scope AA, it is adequate.
- Branch delivery systems provide good accessibility to individuals living in low- and moderate-income (LMI) geographies in the bank’s AAs.
- ANB provided a limited level of CD services to its full-scope AAs during this 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 the 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 at least 120 percent of the area median income, or a median family income that is at least 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, 2010, ANB had total assets of \$1.7 billion and Tier One Capital of \$184 million.

ANB is a wholly owned subsidiary of Sturm Financial Group, Inc., (SFG), which is headquartered in Denver, Colorado. As of December 31, 2010, SFG had total assets of \$1.9 billion. SFG owns 100 percent of ANB. In addition to ANB, SFG operates Premier Bank (PBK) in Kansas and Missouri. SFG also owns Northern Lights, whose purpose is to acquire, hold, and dispose of criticized and classified assets from ANB and PBK. Within ANB, there is a wholly owned subsidiary, Community First Data Services (CFDS). CFDS is a full service data center and provides mainframe processing and network services to all SFG banks and three non-affiliate banks.

ANB offers a full range of credit products within its AAs including commercial, real estate, and consumer loans. The bank's primary focus is commercial lending to small- and mid-sized businesses. The bank operates a mortgage loan department. All the loans from the mortgage department are intended for sale on the secondary market. Throughout the evaluation period the bank has had an underwriter on staff in the offices of the bank's affiliate, PBK. This underwriter processed mortgage loans originated in the Colorado, Wyoming, Kansas, and Missouri markets. All loans underwritten by the ANB underwriter were included on the bank's 2008 and 2009 HMDA Loan Application Registers (LARs).

By dollar amount, ANB's loan portfolio consisted of the following types of credit as of Dec. 31, 2010: 46 percent real estate secured; 25 percent one-to-four family residential; 14 percent commercial and industrial; 10 percent construction and land development; 3 percent consumer and other loans; and 2 percent agricultural loans.

ANB operates as an interstate bank with offices in Colorado and Wyoming. In December 31, 2009, the bank had 29 branches in Colorado and nine branches in Wyoming. In addition to the 38 branches, the bank has 45 ATMs in Colorado and 22 ATMs in Wyoming.

The bank has designated the following ten AAs.

Colorado

- Boulder MSA
- Colorado Springs MSA
- Denver-Aurora MSA
- Grand Junction MSA
- Eagle, Garfield, and Pitkin Counties
- San Miguel County

Wyoming

- Cheyenne MSA
- Casper MSA
- Albany County

- Northern Wyoming (Big Horn, Campbell, Hot Springs, Johnson, Park, Sheridan, and Washakie Counties)

There are no legal, financial, or other impediments that would hamper the bank's ability to help meet the credit needs of its AAs. ANB received a "Satisfactory" rating under the prior Large Bank CRA Examination performed as of March 6, 2007.

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, 2008 to June 30, 2010. We based market comparisons on 2009 peer mortgage data and 2009 peer small business data. The evaluation period for community development loans, investments, and services is March 26, 2007 to January 24, 2011.

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 two loans to farms in the full-scope AAs during the evaluation period. Consequently, the data is not meaningful.

We also did not analyze multi-family loans as the bank did not report any loans in the full-scope AAs. In addition, banks are no longer required to report multi-family 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 2009 and 2010 was found to be substantially accurate. We also reviewed CD 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; the Colorado Springs MSA and Denver-Aurora MSA. Combined, these AAs represent 55 percent of the deposits and 69 percent of the number of reportable loans in Colorado. The Colorado Springs AA represents 28 percent of total deposits and 39 percent of the total number of reportable loans. The Denver-Aurora AA represents 27 percent of total deposits and 30 percent of the total number of reportable loans. We also performed a full-scope review of the Cheyenne AA which represents 44 percent of total deposits and 23 percent of the 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 AA's.

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 home mortgage lending was weighted more heavily because the majority of the bank's reportable products were HMDA products. Home mortgage loans represent 67 percent of the total HMDA and CRA loans reported during the evaluation period for the AAs that received full scope reviews. Within the bank's HMDA lending, home purchase, home improvement, and home refinance loans are weighted based on volume. Small farm loans are so few in number of the full-scope AAs that no weight was given to these in this evaluation.

We also gave consideration to qualitative factors such as complexity, innovation, responsiveness, and flexible lending programs. CD 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 CD services receive a lesser amount of weight in overall conclusions of the Service Test. However, CD services, if significant, can have a positive impact on the overall Service Test Ratings.

Fair Lending or Other Illegal Credit Practices 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: High Satisfactory

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors that support this rating include:

- ANB's level of originated and purchased loans in its full-scope AAs in Colorado is adequate.
- The geographic distribution of ANB's home mortgage loans is adequate and 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 and to businesses of different sizes is good.
- ANB provided \$3 million in CD loans in its full-scope AAs in Colorado. This level of CD lending had a neutral impact on the bank's lending performance.
- ANB demonstrated excellent performance in providing qualified CD investments and donations in its full scope AAs.
- Branch delivery systems provide good accessibility to individuals living in LMI geographies.
- ANB provided a limited level of CD services in its Colorado AAs during this evaluation period.

Description of Institution's Operations in Colorado

Refer to the market profiles for the Colorado Springs and 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 29 branches and 45 ATMs in the state of Colorado. Based on dollar volume, Colorado operations account for 71 percent of the bank's loans and 74 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 AA are: Colorado Capital Bank; Colorado Business Bank; Guaranty Bank; Colorado State Bank; Community Banks of Colorado; Mile High Bank; U.S. Bank, N.A.; Wells Fargo Bank, N.A.; and Citywide Bank. Major competitors in the Colorado Springs AA are: Academy National Bank; First Community Bank; Bank at Broadmoor; Peoples National Bank; Well Fargo Bank, N.A.; Bank of America, N.A.; U.S. Bank, N.A.; and Ent Credit Union (a very large credit union that provides significant competition for all of the financial institutions in the AA).

Scope of Evaluation in Colorado

The Colorado Springs AA and Denver-Aurora AA received full-scope reviews. The evaluation of the bank's CRA performance in the state of Colorado is based primarily upon its lending, investment, and service activities in the full-scope AAs. These AAs represent ANB's major loan and deposit markets and are most significant to the bank's operations. The Boulder, Eagle-Garfield-Pitkin, Grand Junction, and San Miguel AAs received limited-scope reviews. While the state rating was based primarily upon conclusions drawn in the full-scope AAs, the state rating was also influenced by performance in the limited-scope areas.

The bank's performance under the lending test carried the most weight in the overall CRA rating for the state. Performance under the investment test and service test carried less weight, but still played an important role. Under the lending test, the bank's home mortgage loan products were weighted more heavily than small loans to businesses. This was due to the bank achieving overall greater lending volume in the HMDA reportable products of home purchase, home improvement, and mortgage refinance loans.

We completed community contacts with two organizations serving each of the bank's full-scope AAs. The contacts indicate the greatest CD needs in the Colorado-Springs and Denver-Aurora AAs is affordable housing and financial literacy education.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Colorado is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Colorado Springs and Denver-Aurora AAs is good.

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 \$143 million in reportable home mortgage loans, \$73 million in small loans to businesses, and \$361 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. In regard to the lending market share, we considered lenders who do not have deposit-taking facilities in the ANB's AA but reported one or more home mortgage loans and one or more small loans to businesses in the AAs in 2009. 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 percentages to match lending market share percentages in order for performance to be considered good.

The level of lending in the Colorado Springs AA is adequate. Based on June 30, 2010 FDIC deposit market share data, there were 43 deposit-taking financial institutions with one or more banking offices in the Colorado Springs AA. Based on dollar volume of deposits, ANB ranked 4th with a deposit market share of 5.43 percent. Peer small business loan data for 2009 indicates the bank ranked 17th among 79 lenders that reported small business loans with a market share of 0.44 percent based on number of loans. Peer home mortgage loan data for 2009 indicates the bank's market share is 0.28 percent for mortgage loans.

The level of lending in the Denver-Aurora AA is good. Based on June 30, 2010 FDIC deposit market share data, there were 89 deposit-taking financial institutions with one or more banking offices in the Denver-Aurora AA. Based on dollar volume of deposits, ANB ranked 39th with a deposit market share of 0.50 percent. Peer small business loan data for 2009 indicates the bank ranked 32 among 149 lenders that reported small business loans with a market share of 0.12 percent. Peer home mortgage data for 2009 indicates ANB's market share is 0.04 percent for mortgage loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 geographic distribution of the three home mortgage loan products was good in the bank's full-scope AAs in Colorado. Increasing poverty levels during the evaluation period and the existence of only one low-income census tract in the Colorado Springs AA affected the evaluation of geographic distribution. On a broader scale, the recent recession's effect on the credit markets created challenges to lending during this evaluation period. Additionally, the bank's small size relative to other national and regional lenders active in the full-scope AAs is an important contextual factor in this evaluation. These factors can be barriers to lending, affecting a bank's ability to achieve geographic distribution commensurate with the distribution of census tracts by income level in its AAs. When evaluating the bank's performance within the context of these barriers, geographic distribution is good in both full-scope AAs.

For home purchase loans, the bank's geographic distribution to LMI CTs was adequate in the Colorado Springs AA. The bank did not make any home purchase loans in low-income CTs, but the distribution and market share in moderate-income CTs was higher than the demographic comparators. In view of the mitigating factors discussed above, more weight was placed on the bank's performance in moderate-income geographies.

The geographic distribution of home purchase loans in the Denver-Aurora AA was good. In low-income CTs, both the distribution and market share of loans exceeded the demographic and market share comparators. In moderate-income CTs, the distribution of loans was

somewhat lower than the demographic comparator, but the bank's market share was also significantly below its overall market share for these loans in the AA.

For home improvement loans, the bank's pattern of lending to LMI geographies was poor in the Colorado Springs AA and adequate in the Denver-Aurora AA. In the Colorado Springs AA, the bank did not make any home improvement loans to low-income geographies. The distribution in moderate-income CTs was somewhat lower than the demographic, and the bank's market share in moderate-income CTs was significantly below the bank's overall market share. In this instance, more emphasis was placed on distribution over market share because the market share is only reflective of the most recent data available (i.e., 2009 HMDA peer data). The bank's relatively small number of loans does not compare well against the other larger lenders active in the AA. In the Denver-Aurora AA, the bank did not make any home improvement loans in low-income CTs, but substantially exceeded the comparators in moderate-income CTs.

For home refinance loans, the geographic distribution of loans was adequate in the Colorado Springs AA and good in the Denver-Aurora AA. In the Colorado Springs AA, the bank did not make any home refinance loans in low-income CTs. The distribution in moderate-income geographies was somewhat lower than the demographic, but the market share was higher than the bank's overall market share for these loans in the AA. In the Denver-Aurora AA, both the distribution and market share performance in low-income CTs were higher than the respective comparators. In moderate-income geographies, the distribution was well below the demographic comparator, but the market share exceeded the comparator.

The bank did not make a sufficient volume of multifamily loans or small loans to farms in either of the full-scope AAs in Colorado to enable a meaningful analysis of geographic distribution of those loan products.

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.

The geographic distribution of small loans to businesses was excellent in both full-scope AAs. The effects of the recession on overall economic activity and business lending were considered when arriving at this conclusion. In the Colorado Springs AA, the distribution and market share exceeded the respective comparators in LMI geographies. The same performance levels were evident in the Denver-Aurora AA. Both distribution and market share performance exceeded the comparators in LMI geographies.

Lending Gap Analysis

We reviewed ANB's lending data for HMDA and CRA reportable loan products made in the bank's AAs in order to identify conspicuous gaps in the geographic distribution of these loans. After considering the bank's lending volumes, 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 98 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, borrower distribution of the three home mortgage loan products was good in both full-scope AAs. Factors affecting the evaluation of borrower distribution are increasing poverty levels during the evaluation period, increasing rates of unemployment, and declining home values. Also, the pervasive adverse effect of the recent recession on the credit markets created challenges to lending during this evaluation period. These factors can be barriers to lending activity and affect a bank's ability to achieve borrower distribution that is commensurate with the distribution of families by income level in its AAs.

For home purchase loans, the bank's pattern of lending to LMI borrowers was excellent in the Colorado Springs AA and adequate in the Denver-Aurora AA. In Colorado Springs, both the distribution and the market share of home purchase loans to LMI borrowers were higher than the comparators. In the Denver-Aurora AA, distribution was significantly lower than the comparator for low-income borrowers and somewhat lower than the comparator for moderate-income borrowers.

For home improvement loans, the bank's distribution to LMI borrowers was excellent in the Colorado Springs AA and good in the Denver-Aurora AA. In Colorado Springs, the effects of high unemployment rates, high poverty rates, and declining home values were considered when evaluating ANB's lending to LMI borrowers. The distribution to low-income borrowers was below the demographic comparator but market share was above overall market share. In the Colorado Springs AA, both the distribution and the market share of home improvement loans to moderate-income borrowers were higher than the comparators. In the Denver-Aurora AA, both the distribution and market share performance exceeded the respective comparators for low-income borrowers. The distribution to moderate-income borrowers exceeded the comparator, but the bank did not register any market share with moderate-income borrowers for this product. This is considered an anomaly and is inconsistent with other performance indicators for this product in this AA. As a result, this performance statistic was discounted in the overall conclusion for this product in the Denver-Aurora AA.

For mortgage refinance loans, the borrower distribution of loans was adequate in both the Colorado Springs and Denver-Aurora AAs. In the Colorado Springs AA, the bank achieved distribution to low-income borrowers that was significantly lower than the comparator. In

contrast, the bank's market share amongst those borrowers exceeded the comparator. ANB's distribution to moderate-income borrowers was somewhat lower than the comparator, but its market share nearly met the comparator. In the Denver-Aurora AA, distribution to both low- and moderate-income borrowers was well below the comparators. Market share exceeded overall market share for loans to low-income borrowers but was lower than overall market share for moderate-income borrowers.

The bank did not make a sufficient volume of multifamily loans or small loans to farms in either of the full-scope AAs in Colorado to enable a meaningful analysis of borrower distribution of those loan products.

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 and purchase of small loans to businesses.

After considering the effects of the recession on overall economic activity and business lending in the full-scope areas, the borrower distribution of small loans to businesses was adequate in both the Colorado Springs AA and Denver-Aurora AA. In the Colorado Springs AA, the percentage of small loans to businesses that were in amounts of \$100 thousand or less was adequate. The bank's market share of loans made to businesses with revenues of \$1 million or less exceeded its market share of all small loans to businesses. The percentage of reported small loans to businesses that were made to businesses with revenues of \$1 million or less was well below the percentage of businesses in the AA that generate revenues of \$1 million or less.

In the Denver-Aurora AA, the percentage of small loans to businesses that were in amounts of \$100 thousand or less was poor. The bank's market share of loans made to businesses with revenues of \$1 million or less was below its market share of all small loans to businesses. The percentage of reported small loans to businesses that were made to businesses with revenues of \$1 million or less was well below the percentage of businesses in the AA that generate revenues of \$1 million or less.

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 CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated one qualified CD loan totaling \$3 million in the Colorado Springs MSA and no CD loans in the Denver-Aurora MSA during this review period. The loan was responsive to the credit needs in the bank's Colorado Springs AA by providing job training and transitional housing for LMI individuals. However, the level of CD loans did not have a significant impact on the overall lending test rating for the state of Colorado.

Product Innovation and Flexibility

The bank did not offer any innovative loan products during this evaluation period. However, it did participate in flexible mortgage loan products in Colorado. These products were U.S. government loan programs offered by FHA and VA. Through the use of these programs the bank offers underwriting and/or pricing concessions to the borrowers that it does not otherwise offer on conventional loans. These concessions include low down payments, low closing costs, and less stringent credit qualifications. The bank reported making 70 FHA loans and 30 VA loans in Colorado. However it did not provide information about the number of LMI borrowers that benefited from the use of those loan programs, and therefore these products were not considered in the overall CRA assessment.

During this evaluation period the bank also participated in a special loan program that is offered through the Colorado Housing & Finance Authority (CHFA). This product was described as a first time home buyer program that offers a hybrid loan that combines FHA loan benefits with down payment assistance for LMI borrowers. The bank reported making one loan under this program to a borrower in the Colorado Springs AA.

The use of product innovation and flexibility did not have a material impact on the rating for the lending test in the state of Colorado for this evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

The evaluation of the bank's performance under the lending test in the limited-scope AAs was difficult. The reasons for this difficulty were the relative absence of low- or moderate-income CTs in those areas and/or the lack of significant lending volume in one or more CRA reportable loan products in those areas. Under these circumstances any analysis of geographic distribution of lending activity in most of these limited-scope AAs would be meaningless. Therefore, our review of the limited-scope areas focused primarily upon borrower distribution.

Based on limited-scope reviews, the bank's performance under the lending test in the Grand Junction AA was stronger than the bank's overall performance in the state. This is based primarily upon market share of small loans to businesses in moderate-income CTs that exceeded the comparator and market share of loans to businesses with revenues of \$1 million or less that also exceeds the comparator. Performance in the Boulder AA is consistent with the overall performance under the lending test in the state. Performance in the Eagle-Garfield-Pitkin AA is weaker than the bank's overall performance in the state. The relatively weaker performance in this AA is due to overall poor borrower distribution in the home mortgage loan and small loans to businesses products. In the San Miguel AA, performance was not determined due to nominal loan volume. In Colorado, lending activity in the limited-scope AAs had a neutral effect on the overall evaluation of the bank's performance under the lending test.

Refer to Tables 1 through 11 in the "State of Colorado" section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

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.

The bank originated 98 qualified investments nearing \$5.9 million during this evaluation period and held three investments of \$3.7 million from the prior period in its Colorado AAs. We allocated investments by AA, comparing the dollar volume to allocated Tier One Capital as a reference.

ANB invested over \$3.2 million in the Colorado Springs AA. This investment activity represents over 8 percent of allocated Tier One Capital. This level of investments represents excellent performance based on their responsiveness to credit needs of low- and moderate-income individuals. Investments consist of mortgage-backed securities and qualified donations to 17 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. Although these investments are not innovative, they are responsive to a significant community development need in the Colorado Springs AA.

ANB's performance in the Denver-Aurora AA is good. Sixty-six (66) percent of the bank's investments, based on dollar volume, are in this AA. Prior and current period investments total \$6.4 million and equal 17 percent of allocated Tier One Capital. The largest portion, or 99 percent, of these investments consist of mortgage-backed securities, which support affordable housing for LMI individuals. However, according to one of our community contacts, these types of securities are not as responsive to the credit needs in the Denver-Aurora AA. 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 Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Grand Junction and Eagle-Garfield-Pitkin AAs is not consistent with the bank's overall "Outstanding" performance under the investment test in Colorado. In the Boulder and San Miguel AAs, performance is weak. ANB did not provide any investments in these AAs. However, this level of performance did not have a significant impact on the overall investment test rating for the state of Colorado.

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 "High Satisfactory". Based on full-scope reviews, performance in the Colorado Springs and Denver-Aurora AAs is good.

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 good distribution of branches in the Colorado Springs AA and the good distribution in the Denver-Aurora AA. In the Colorado Springs AA, the percentage of branches in low-income CTs is significantly above the percentage of the population that lives in these geographies. The percentage of branches in moderate-income CTs in the Colorado Springs AA 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 AA, the percentage of branches in moderate-income CTs is also below the portion of the population living in these geographies. Two branches which are located in middle-income CTs are bordered by LMI CTs, which is a compensating factor.

The bank did not close any branches or ATMs in the low- to moderate-income CTs during this review period. However, the opening of two full service branches in upper income areas has reduced the percentage of branches located in LMI geographies.

ANB's ATM network offers a reasonable alternative system for delivering retail banking services in LMI geographies. In the Colorado Springs AA, 14 percent of the ATMs are located in low-income CTs and 14 percent are located in moderate-income CTs. This exceeds the portion of the population living in low-income CTs, but is below the portion of the population living in moderate-income CTs. In the Denver-Aurora AA, 17 percent of the ATMs are located in moderate-income CTs. This is below 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 AAs 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 LMI geographies are substantially similar to those offered in other geographies. All Colorado Springs AA branches offer Saturday hours. Full-service banking is offered during regular business hours at all locations.

Community Development Services

ANB provided a limited number of CD services to qualified CD organizations in its Colorado AAs during this evaluation period.

The bank provides a number of service hours to various organizations in the community, but not all the organizations have a primary purpose of community development and thus do not qualify for CRA consideration. In other cases, the service provided by the bank employee is neither financial nor technical. Those financial or technical services, which were directly related to qualifying organizations that meet identified community credit needs, totaled 167 hours. Of these hours, the Colorado Springs AA had 106 hours of qualified services and the Denver AA had 61 hours of qualified services.

The decline in eligible CD services is partially attributed to significant staffing reductions made in response to the recent economic downturn. Many of these eliminated positions were responsible for a considerable amount of ANB's community representation.

Wyoming State Rating

CRA Rating for Wyoming:

The lending test is rated: **High Satisfactory**

The investment test is rated: **Low Satisfactory**

The service test is rated: **High Satisfactory**

The major factors that support this rating include:

- ANB's level of originated and purchased loans in its full-scope Wyoming AA is good.
- The geographic distribution of ANB's home mortgage loans is good and the geographic distribution of loans to businesses of different sizes 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 adequate.
- ANB demonstrated adequate performance in providing qualified CD investments and donations in its full scope AAs.
- Branch delivery systems provide good accessibility to individuals living in LMI geographies in larger markets and reasonable accessibility in smaller markets.
- ANB provided a limited level of CD services to its Wyoming AAs during this review period.

Description of Institution's Operations in Wyoming

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

ANB operates 9 branches and 22 ATMs in the state of Wyoming. Based on dollar volume, Wyoming operations account for 29 percent of the bank's loans and 26 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 evaluation of ANB's CRA performance in the state of Wyoming is based primarily upon its lending, investment, and service activities in its full-scope AA. The Cheyenne AA was selected for a full-scope review. This AA represents ANB's major loan and deposit market in the state of Wyoming. The Albany, Casper, and Northern Wyoming AAs received limited-scope reviews. While the state rating was based primarily upon conclusions in the full-scope AA, the state rating was also influenced by performance in the limited-scope AAs.

The bank's performance under the lending test carried the most weight in the overall CRA rating for the state. Performance under the investment test and service test carried less weight, but still played an important role. Under the lending test the bank's home mortgage loan products were weighted more heavily than small loans to businesses. This was due to the bank achieving overall greater lending volume in the HMDA reportable products of home purchase, home improvement, and mortgage refinance loans.

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 the area credit needs and the bank's deposit market share. Over the evaluation period, ANB originated \$45.6 million in reportable home mortgage loans, \$30.6 million in small loans to businesses and \$13.6 million in loans to small farms.

To analyze ANB's lending activity we compared the bank's deposit market share with its lending market share for home mortgage loan 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 includes lenders who did 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 2009. 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, 2010 FDIC deposit market share data, there were 19 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 13.82 percent. Peer small business loan data for 2009 indicates the bank ranked 11th among 35 lenders that reported small business loans in the Cheyenne MSA,

with a market share of 1.10 percent. Peer home mortgage data for 2009 indicates the bank's market share is 0.57 percent for home mortgage loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 AA is good. This is based on the distribution of home mortgage loans in moderate-income CTs. There are no low-income CTs in the Cheyenne AA. Factors affecting the evaluation of geographic distribution are similar to those that affected our evaluation of the bank's performance in Colorado. Since the previous CRA evaluation, the Cheyenne AA has experienced a rise in poverty levels, a rise in unemployment, and a decline in home values. The pervasive adverse effect of the recent recession on the credit markets created challenges to lending. Also, the bank's small size relative to other national and regional lenders active in the full-scope AA is an important contextual factor in this evaluation. These factors can be barriers to lending activity and can affect a bank's ability to achieve geographic distribution commensurate with the distribution of CTs by income level in its AAs.

For home purchase loans, the bank's geographic distribution to moderate-income CTs was excellent in the Cheyenne AA. In Cheyenne, both the distribution and the market share of home purchase loans in moderate-income CTs equaled or exceeded the respective distribution and market share comparators.

The bank did not make a sufficient number of home improvement loans to enable a meaningful analysis of the geographical distribution of this product. The relatively low volume achieved in this product is not a negative factor in this evaluation due to the economic conditions noted above.

For home refinance loans, the geographic distribution to moderate-income CTs was adequate. In the Cheyenne AA, both the distribution and market share of home refinance loans in moderate-income CTs was somewhat lower than the respective distribution and market share comparators.

The bank did not make a sufficient volume of multifamily loans or small loans to farms in the full-scope AA in Wyoming to enable a meaningful analysis of geographic distribution of those loan products.

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 and purchase of small loans to businesses.

The geographic distribution of small loans to businesses in moderate-income CTs was excellent in the Cheyenne AA. Both the distribution and the market share of small loans to businesses equaled or exceeded the respective distribution and market share comparators.

Lending Gap Analysis

We reviewed the bank's lending data for HMDA and CRA reportable loan products made in the bank's AAs in order to identify conspicuous 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. Ninety-eight (98) percent of the HMDA loans and 98 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.

Overall borrower distribution of home mortgage loan products was good in the Cheyenne AA. The adverse economic factors discussed earlier also affect analysis of borrower distribution. Rising poverty and unemployment rates reduce the pool of creditworthy borrowers, and the opportunity to make loans. Declining housing values erode or eliminate the equity borrowers rely on to obtain certain kinds of loans. However, the bank managed to achieve good performance in the context of these barriers.

For home purchase loans, the bank's pattern of lending to LMI borrowers was excellent in the Cheyenne AA. In Cheyenne, both the distribution and the market share of home purchase loans to low-income borrowers were equal to or exceeded the respective comparators. The distribution and market share of loans made to moderate-income borrowers also equaled or exceeded the comparators.

The volume of home improvement loans was insufficient for meaningful analysis.

Overall distribution of home refinance loans to LMI borrowers is good. For home refinance loans, the distribution of loans to low-income borrowers was poor, but the distribution to moderate-income borrowers was excellent. The distribution of the bank's loans to low-income borrowers was significantly lower than the respective comparators. The bank did not register a market share to low-income borrowers. On the other hand, the distribution of loans to

moderate-income borrowers and market share significantly exceeded the respective comparators.

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.

The borrower distribution of small loans to businesses in the Cheyenne AA was adequate. The percentage of small loans to businesses that were in amounts of \$100 thousand or less was adequate. The bank’s market share of loans made to businesses with revenues of \$1 million or less exceeds the market share of all small loans to businesses. The percentage of reported small loans to businesses that were made to businesses with revenues of \$1 million or less was well below the percentage of businesses in the AA that generate revenues of \$1 million or less.

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 CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank did not originate any qualified CD loans in the Cheyenne MSA during this evaluation period. However, the bank originated \$3 million in two CD loans in the Northern Wyoming limited-scope AA. 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 did not offer any innovative loan products in Wyoming during this evaluation period. However, it did participate in flexible mortgage loan products. These products were U.S. government loan programs offered by FHA and VA. The use of these programs allows the bank to offer underwriting and pricing concessions that it would not otherwise offer on conventional loans, thus making home mortgage loans more accessible to borrowers, including LMI borrowers. These concessions include low down payments, low closing costs, and less stringent credit qualifications. The bank reported making 35 FHA loans and two VA loans in its Wyoming AAs during the evaluation period. However it did not provide information about the number of LMI borrowers that benefited from the use of those loan programs, and therefore these products were not considered in the overall CRA assessment. These loans were reported in the bank’s HMDA data and are reflected in the lending tables in Appendix D of this document.

During this evaluation period the bank also participated in a loan program that is offered through the Wyoming Community Development Authority (WCDA). This program offers a hybrid loan that combines FHA loan benefits with down payment assistance for LMI borrowers. The bank reports that of the 35 FHA loans made in Wyoming, nine were WCDA loans. Five (5) of those loans were made in the Cheyenne AA; four loans were to borrowers in the Albany

AA. The use of this product enhanced the bank's performance under the lending test and received positive consideration in our evaluation of the bank's performance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Casper, Albany, and Northern Wyoming AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in the state of Wyoming. In the Casper and Albany AAs, the bank's performance was stronger than the bank's performance under the lending test in the full-scope area. The bank's performance in the Northern Wyoming nonmetropolitan area was similar to its performance in the full-scope area.

Refer to 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

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.

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 originated 69 qualified investments totaling over \$82 thousand in its Wyoming AAs. Over \$57 thousand, or nearly 70 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 AA represents less than 1 percent of allocated Tier One Capital. We considered this to be adequate considering 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, Albany, and Northern Wyoming AAs is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in the state of Wyoming. 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.

Refer to 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 Wyoming is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Cheyenne AA is adequate.

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. 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 satisfactory distribution of branches in the Cheyenne AA. The percentage of branches in moderate-income geographies in the Cheyenne AA is near to the population that lives in these geographies.

The bank did not close any branches or ATMs in the moderate-income CTs (and there are no low-income CTs) during this period.

ANB's ATM network offers a reasonable alternative system for delivering retail banking services in LMI geographies. In the Cheyenne AA, 57 percent of the ATMs are located in moderate-income CTs. This exceeds the portion of the population living in LMI 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 Cheyenne AA 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 some of the branches located in moderate-income geographies 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 did not provide any CD services to qualified CD organizations in its full-scope Wyoming AA during this evaluation period.

The bank provides a number of service hours to various organizations in WY communities. However, services were either provided to organizations with a primary purpose other than community development or the service performed did not involve a provision of financial or technical services. Consequently, these services do not qualify for CRA consideration.

The decline in eligible CD services is partially attributed to significant staffing reductions as a result of the recent economic downturn. Many of these eliminated positions were responsible for a considerable amount of ANB's community representation.

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 (excludes CD Loans): 1/1/08 to 6/30/10 Investment and Service Tests and CD Loans: 3/26/07 to 1/24/11	
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. -- 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 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 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	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Colorado	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wyoming	High Satisfactory	Low Satisfactory	High Satisfactory	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 AA						
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
Businesses by Geography	47,798	3.92	21.00	44.34	30.74	0.00
Farms by Geography	1,117	1.70	15.49	56.58	26.23	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
Median Family Income	54,036			Median Housing Value	150,808	
HUD Adjusted Median Family Income for 2010	70,600			Unemployment Rate as	9.4%	
Households Below the Poverty Level	8%			of 11/30/10		

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

Source: 2000 US Census and 2010 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 seven branches and seven ATMs in this AA. The Colorado Springs AA represents 28 percent of area deposits and 39 percent of reportable loans.

This area is heavily banked with 43 banks operating 168 branches. Wells Fargo Bank, N.A. and JP Morgan Chase, N.A. have the largest presence with 37 percent market share of deposits. ANB is ranked fourth in the market and the market share represents 5 percent of deposits.

Economic conditions in the Colorado Springs MSA have declined during the reporting period. According to the Bureau of Labor and Statistics, as of November 30, 2010, the unemployment rate in the Colorado Springs MSA was 9.4 percent, which is slightly higher than the state of Colorado (8.8 percent). The major employer in this AA is the federal government. The civilian labor force totals just over 305,000, and approximately 17 percent are employed by the

government. The Colorado Springs MSA has several large military installations including: Fort Carson Army Base; Peterson Air Force Base; Schriever Air Force Base; and the U.S. Air Force Academy. Other major industries include service, retail trade, tourism and construction. The HUD updated medium family income for 2010 was \$70,600. The most current data indicates the median home price has declined from \$205,300 in 2005 to \$150,800 in 2010.

According to the 2000 US Census, 8 percent of families lived below the poverty level. The US Census conducts interim surveys to supplement the decennial census. The American Community Survey is one such survey. According to the 2007-2009 American Community Survey 3-Year Estimate, 11 percent of people in the Colorado Springs MSA continue to live below the poverty level.

We interviewed a community contact serving this AA. The contact indicated there is a need in the AA for below-market financing for predevelopment and construction loans related to the provision of affordable housing, grant funding, and volunteers for financial literacy education and counseling efforts.

Denver-Aurora MSA #19740

Demographic Information for Full-Scope Area: Denver-Aurora AA						
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	220,780	3.33	21.49	37.53	36.64	1.02
Farms by Geography	4,338	1.54	18.93	41.77	37.32	0.44
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
Median Family Income	61,301	Median Housing Value		180,045		
HUD Adjusted Median Family Income for 2010	75,900	Unemployment Rate as		8.7%		
Households Below the Poverty Level	7%	of 11/30/10				

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

Source: 2000 US Census and 2010 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. The Denver MSA is the 21st largest metropolitan statistical area in the United States with a population of 2.5 million. The population of the Denver-Aurora MSA has increased to 2.5 million, an annual growth rate of 1.9 percent (Source: Denver Metro Chamber of Commerce data). The population in the Denver-Aurora MSA represents just over 50 percent of Colorado's population.

The Denver-Aurora MSA has excellent north and south accessibility via Interstate 25 and east/west convenience of Interstate 70. Rail service, including light rail, and Denver International Airport is also available.

Based on the 2000 US Census data, the Denver-Aurora MSA consists of 526 CTs; 21 or 4 percent are low-income and 145 or 28 percent are moderate-income. ANB operates 6 branches and 6 ATMs in the Denver-Aurora MSA. The Denver-Aurora MSA represents 30 percent of rated loans made during the review period and 27 percent of total bank deposits.

The area is heavily banked with 89 chartered banks operating 733 branches. Wells Fargo Bank, N.A. and US Bank, N.A. have the largest presence with 34 percent market share of deposits. ANB's market share is 0.50 percent as of June 30, 2010.

As of the last quarter of 2010, job growth in the Denver-Aurora MSA remains negative. While the unemployment rate for the Denver-Aurora MSA is lower than the national average of 9.8 percent, it remains relatively high at 8.7 percent as of November 30, 2010 (Source: Bureau of

Labor Statistics). Health care and social assistance, professional and technical service, and tourism services are the largest employers for the area. Depressed home and commercial real estate prices continue to impact the local economy.

According to the 2000 US Census, 7 percent of families lived below the poverty level. The US Census conducts interim surveys to supplement the decennial census. The American Community Survey is one such survey. According to the 2007-2009 American Community Survey 3-Year Estimate, 12 percent of people in the Denver-Aurora MSA continue to live below the poverty level.

Colorado is the 13th wealthiest state in the country and this is reflected in the median family income for the Denver-Aurora MSA. The 2009 HUD median family income for the Denver-Aurora MSA is \$75,900, which ranks 10th in the 25 largest metropolitan areas.

While the median family income for the AA is high, the cost of living is also high. According to the June 30, 2010 ACCRA cost of living index information, the cost of living in Denver is slightly higher than the national average. According to the National Association of Realtors, the median family home value has declined from \$247,100 in 2005 to \$219,000 in 2010. This is still well above the national average of \$185,000.

There are four Community Housing Development Organizations active in the city of Denver. Those include: Newer West Side Economic Development (NewSED); North East Denver Housing Authority; Del Norte Community Development Corporation; and the Colorado Coalition for the Homeless.

The CD 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 a number of community development corporations and small business gap lenders active in the Denver-Aurora MSA.

Community contacts indicated opportunities for banks through participation as funding partners and financiers of rental, for-sale, and special housing (manufactured homes, farm worker housing, and housing for seniors and the disabled). The contact indicated that partnerships with mid-size banks looking for CRA investments would help address affordable housing needs. Mortgage-backed securities are available to banks looking to invest in the MSA, but these investments are not as meaningful as ongoing partnerships. The contact also expressed the need for foreclosure counseling. Banks are needed to help fund homeowner and foreclosure counseling for LMI individuals.

State of Wyoming Full-Scope Assessment Areas

Cheyenne MSA #16940

Demographic Information for Full-Scope Area: Cheyenne AA						
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
Businesses by Geography	7,238	0.00	38.86	41.25	19.88	0.00
Farms by Geography	262	0.00	10.31	59.54	30.15	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
Median Family Income	46,452					
HUD Adjusted Median Family Income for 2010	67,400					
Households Below the Poverty Level	9%					
			Median Housing Value	97,568		
			Unemployment Rate as of 11/30/10	7.0%		

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

Source: 2000 US Census and 2010 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 four branches and 14 ATMs in this AA. The Cheyenne MSA represents 44 percent of area deposits and 23 percent of reportable loans.

The area is moderately banked with 19 banks operating 31 branches. Wells Fargo Bank, N.A. has the largest presence with 18 percent market share of deposits. ANB is ranked second with 14 percent of the market share.

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 employs 3,000 non-military employees and state government employs nearly as many. Other major employers include the Wal-Mart Distribution Center with over 400 employees and Lowes Distribution Center with 425 employees.

As of November 30, 2010, the unemployment rate was 7 percent. The HUD updated median family income for 2010 was \$46,542. The most current data indicates that the median housing value in 2010 was \$97,568.

According to the 2000 US Census, 9 percent of families lived below the poverty level. The US Census conducts interim surveys to supplement the decennial census. The American Community Survey is one such survey. According to the 2007-2009 American Community Survey 3-Year Estimate, 9 percent of people in the Cheyenne MSA continue to live below the poverty level.

We interviewed a community contact serving this AA. The contact indicated a need for better access to pre-development funding and construction financing for Low Income Housing Tax Credit (LIHTC) deals. Community development organizations could also use volunteers for financial literacy efforts.

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. See Interagency Q&As __.12 (i) –5 and –6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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/assessment area. 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.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) –5 and –6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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/assessment area. The table also presents data on branch openings and closings in each MA/assessment area.

Tables of Performance Data

State of Colorado

Table 1. Lending Volume

LENDING VOLUME		Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010				
Assessment Area (2010):	% 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 2010 AA	38.64	295	55,779	107	22,463	1	361	1	3,000	404	81,603	28.07
Denver-Aurora 2010 AA	29.72	178	38,801	132	26,570	0	0	0	0	310	65,371	26.91
Limited Review:												
Boulder 2010 AA	2.49	7	1,407	19	2,331	0	0	0	0	26	3,738	2.48
Eagle-Garfield-Pitkin 2010	17.26	98	38,975	82	11,429	0	0	0	0	180	50,404	19.88
Grand Jct 2010 AA	11.12	62	7,032	54	9,566	0	0	0	0	116	16,598	19.70
San Miguel 2010 AA	0.77	1	1,206	7	425	0	0	0	0	8	1,631	2.96

* Loan Data as of June 30, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 26, 2007 to January 24, 2011.

*** Deposit Data as of December 31, 2009. 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		Geography: COLORADO					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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 2010 AA	112	47.26	0.11	0.00	18.75	18.75	51.81	50.00	29.33	31.25	0.28	0.00	0.31	0.32	0.19	
Denver-Aurora 2010 AA	59	24.89	1.89	6.78	21.89	16.95	42.97	40.68	33.26	35.59	0.04	0.11	0.02	0.04	0.04	
Limited Review:																
Boulder 2010 AA	4	1.69	0.27	0.00	19.36	0.00	44.99	50.00	35.39	50.00	0.02	0.00	0.00	0.04	0.00	
Eagle-Garfield-Pitkin 2010 AA	43	18.14	0.00	0.00	0.00	0.00	16.57	11.63	83.43	88.37	0.89	0.00	0.00	0.00	1.04	
Grand Jct 2010 AA	18	7.59	0.00	0.00	14.19	16.67	60.18	50.00	25.63	33.33	0.03	0.00	0.00	0.00	0.14	
San Miguel 2010 AA	1	0.42	0.00	0.00	0.00	0.00	25.85	0.00	74.15	100.00	0.88	0.00	0.00	0.00	0.95	

* Based on 2009 Peer Mortgage Data (USPR)

** 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			Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement 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 2010 AA	43	43.00	0.11	0.00	18.75	13.95	51.81	51.16	29.33	34.88	1.39	0.00	0.61	1.54	1.55	
Denver-Aurora 2010 AA	27	27.00	1.89	0.00	21.89	48.15	42.97	29.63	33.26	22.22	0.20	0.00	0.89	0.08	0.08	
Limited Review:																
Boulder 2010 AA	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 2010 AA	7	7.00	0.00	0.00	0.00	0.00	16.57	14.29	83.43	85.71	0.44	0.00	0.00	0.00	0.52	
Grand Jct 2010 AA	23	23.00	0.00	0.00	14.19	13.04	60.18	65.22	25.63	21.74	1.39	0.00	2.13	1.52	0.83	
San Miguel 2010 AA	0	0.00	0.00	0.00	0.00	0.00	25.85	0.00	74.15	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 Peer Mortgage Data (USPR)

** 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			Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010						
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 2010 AA	140	46.51	0.11	0.00	18.75	13.57	51.81	40.00	29.33	46.43	0.27	0.00	0.36	0.23	0.29
Denver-Aurora 2010 AA	91	30.23	1.89	5.49	21.89	13.19	42.97	24.18	33.26	57.14	0.04	0.16	0.07	0.02	0.04
Limited Review:															
Boulder 2010 AA	3	1.00	0.27	0.00	19.36	33.33	44.99	66.67	35.39	0.00	0.02	0.00	0.04	0.02	0.00
Eagle-Garfield-Pitkin 2010 AA	46	15.28	0.00	0.00	0.00	0.00	16.57	23.91	83.43	76.09	0.35	0.00	0.00	0.86	0.27
Grand Jct 2010 AA	21	6.98	0.00	0.00	14.19	9.52	60.18	66.67	25.63	23.81	0.08	0.00	0.00	0.12	0.04
San Miguel 2010 AA	0	0.00	0.00	0.00	0.00	0.00	25.85	0.00	74.15	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** 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				Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010							
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 Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs 2010 AA	107	26.88	3.92	9.35	21.00	26.17	44.34	40.19	30.74	24.30	0.44	1.00	0.66	0.41	0.32
Denver-Aurora 2010 AA	129	32.41	3.33	8.53	21.49	45.74	37.53	23.26	36.64	22.48	0.12	0.30	0.25	0.10	0.07
Limited Review:															
Boulder 2010 AA	19	4.77	1.07	0.00	28.97	31.58	39.79	36.84	30.16	31.58	0.11	0.00	0.14	0.11	0.11
Eagle-Garfield-Pitkin 2010 AA	82	20.60	0.00	0.00	0.00	0.00	12.44	15.85	87.56	84.15	1.10	0.00	0.00	1.75	1.24
Grand Jct 2010 AA	54	13.57	0.00	0.00	23.79	18.52	51.78	51.85	24.43	29.63	0.87	0.00	0.81	0.93	0.93
San Miguel 2010 AA	7	1.76	0.00	0.00	0.00	0.00	13.69	0.00	86.31	100.00	0.76	0.00	0.00	0.00	1.29

* Based on 2009 Peer Mortgage Data (USPR)

** 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010							
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**	% Families1	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs 2010 AA	112	47.06	16.86	16.82	18.85	30.84	24.72	22.43	39.57	29.91	0.32	0.59	0.34	0.25	0.24
Denver-Aurora 2010 AA	60	25.21	18.01	7.14	18.65	14.29	23.68	30.36	39.66	48.21	0.04	0.03	0.04	0.04	0.05
Limited Review:															
Boulder 2010 AA	4	1.68	19.44	33.33	18.52	33.33	22.39	0.00	39.66	33.33	0.02	0.13	0.00	0.00	0.00
Eagle-Garfield-Pitkin 2010 AA	43	18.07	9.52	0.00	13.20	5.00	20.06	17.50	57.22	77.50	1.06	0.00	0.00	1.91	0.96
Grand Jct 2010 AA	18	7.56	17.40	0.00	19.63	6.25	23.69	25.00	39.28	68.75	0.04	0.00	0.00	0.00	0.10
San Miguel 2010 AA	1	0.42	14.57	0.00	10.55	0.00	19.29	0.00	55.59	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

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

1 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		Geography: COLORADO								Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families ²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs 2010 AA	43	43.00	16.86	11.90	18.85	26.19	24.72	30.95	39.57	30.95	1.51	1.79	2.56	1.15	1.18
Denver-Aurora 2010 AA	27	27.00	18.01	23.81	18.65	23.81	23.68	19.05	39.66	33.33	0.07	0.84	0.00	0.00	0.00
Limited Review:															
Boulder 2010 AA	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 2010 AA	7	7.00	9.52	0.00	13.20	14.29	20.06	0.00	57.22	85.71	0.46	0.00	0.00	0.00	0.60
Grand Jct 2010 AA	23	23.00	17.40	8.70	19.63	30.43	23.69	30.43	39.28	30.43	1.44	0.00	4.23	2.56	0.00
San Miguel 2010 AA	0	0.00	14.57	0.00	10.55	0.00	19.29	0.00	55.59	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 7.0% of loans originated and purchased by bank.

² 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				Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010							
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 ³	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp
Full Review:															
Colorado Springs 2010 AA	140	46.51	16.86	7.50	18.85	15.83	24.72	28.33	39.57	48.33	0.33	0.43	0.28	0.39	0.31
Denver-Aurora 2010 AA	91	30.23	18.01	10.13	18.65	12.66	23.68	25.32	39.66	51.90	0.04	0.11	0.03	0.03	0.05
Limited Review:															
Boulder 2010 AA	3	1.00	19.44	0.00	18.52	33.33	22.39	0.00	39.66	66.67	0.02	0.00	0.03	0.00	0.03
Eagle-Garfield-Pitkin 2010 AA	46	15.28	9.52	2.44	13.20	2.44	20.06	26.83	57.22	68.29	0.37	1.41	0.27	0.91	0.25
Grand Jct 2010 AA	21	6.98	17.40	11.11	19.63	22.22	23.69	38.89	39.28	27.78	0.12	0.24	0.08	0.23	0.05
San Miguel 2010 AA	0	0.00	14.57	0.00	10.55	0.00	19.29	0.00	55.59	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 13.3% of loans originated and purchased by bank.

³ 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				Geography: COLORADO			Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010		
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 2010 AA	107	26.68	81.68	43.93	58.88	16.82	24.30	0.44	0.61
Denver-Aurora 2010 AA	132	32.92	79.89	31.82	51.52	22.73	25.76	0.12	0.10
Limited Review:									
Boulder 2010 AA	19	4.74	81.91	21.05	63.16	31.58	5.26	0.11	0.08
Eagle-Garfield-Pitkin 2010 AA	82	20.45	76.94	50.00	63.41	19.51	17.07	1.10	1.44
Grand Jct 2010 AA	54	13.47	80.82	59.26	64.81	14.81	20.37	0.87	1.64
San Miguel 2010 AA	7	1.75	70.53	42.86	100.00	0.00	0.00	0.76	1.08

* Based on 2009 Peer Mortgage Data (USPR)

** 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 - 2010).

**** 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 4.49% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010			
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 2010 AA	0	0	65	3,207	65	3,207	33.25	0	0
Denver-Aurora 2010 AA	3	3,760	19	2,640	22	6,400	66.36	0	0
Limited Review:									
Boulder 2010 AA	0	0	0	0	0	0	0.00	0	0
Eagle-Garfield-Pitkin 2010 AA	0	0	3	4	3	4	.04	0	0
Grand Jct 2010 AA	0	0	11	34	11	34	.35	0	0
San Miguel 2010 AA	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										Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010			
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	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 2010 AA	28.07	7	24.14	14.29	14.29	42.86	28.57	2	0	0	0	0	2	0.32	25.37	49.82	24.49
Denver-Aurora 2010 AA	26.91	6	20.69	0.00	16.67	33.33	50.00	3	0	0	0	2	1	4.56	27.71	40.28	27.32
Limited Review:																	
Boulder 2010 AA	2.48	1	3.45	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 2010 AA	19.88	7	24.14	0.00	0.00	14.29	85.71	0	0	0	0	0	0	0.00	0.00	17.80	82.20
Grand Jct 2010 AA	19.70	6	20.69	0.00	33.33	66.66	0.00	0	0	0	0	0	0	0.00	17.70	60.49	21.81
San Miguel 2010 AA	2.96	2	6.90	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	20.28	79.72

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Colorado Springs 2010 AA	21.43	7	18.42	14.29	14.29	42.86	28.57	7	10.45	14.29	14.29	42.86	28.57	0.32	25.37	49.82	24.49
Denver-Aurora 2010 AA	20.55	6	15.79	0.00	16.67	33.33	50.00	6	8.96	0.00	16.67	33.33	50.00	4.56	27.71	40.28	27.32
Limited Review:																	
Boulder 2010 AA	1.89	1	2.63	0.00	100.00	0.00	0.00	1	1.49	0.00	100.00	0.00	0.00	3.35	25.38	41.56	29.70
Eagle-Garfield-Pitkin 2010 AA	15.18	7	18.42	0.00	0.00	14.29	85.71	15	22.39	0.00	0.00	20.00	80.00	0.00	0.00	17.80	82.20
Grand Jct 2010 AA	15.05	6	15.79	0.00	33.33	66.66	0.00	13	19.40	0.00	30.77	61.54	7.69	0.00	17.70	60.49	21.81
San Miguel 2010 AA	2.26	2	5.26	0.00	0.00	0.00	100.00	3	4.48	0.00	0.00	0.00	100.00	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, 2008 TO JUNE 30, 2010				
Assessment Area (2010):	% 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 WY 2010 AA	22.57	108	15,048	44	7,754	1	15	0	0	153	22,817	43.72
Limited Review:												
Albany WY 2010 AA	16.67	75	14,855	36	3,678	2	60	0	0	113	18,593	12.08
Casper WY 2010 AA	9.44	33	5,648	29	3,609	2	60	0	0	64	9,317	12.38
Northern WY 2010 AA	51.33	88	10,067	122	15,548	138	13,429	2	3,000	350	42,044	31.82

* Loan Data as of June 30, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 26, 2007 to January 24, 2011.

*** Deposit Data as of December 31, 2009. 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		Geography: WYOMING					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	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 WY 2010 AA	61	39.10	0.00	0.00	23.38	24.59	51.37	49.18	25.25	26.23	0.93	0.00	1.50	0.86	0.69	
Limited Review:																
Albany WY 2010 AA	45	28.85	0.25	0.00	11.30	8.89	66.08	73.33	22.37	17.78	2.63	0.00	2.50	3.02	1.66	
Casper WY 2010 AA	14	8.97	0.00	0.00	18.11	14.29	59.40	85.71	22.49	0.00	0.21	0.00	0.35	0.25	0.00	
Northern WY 2010 AA	36	23.08	0.00	0.00	4.38	0.00	83.28	58.33	12.34	41.67	0.31	0.00	0.00	0.15	0.64	

* Based on 2009 Peer Mortgage Data (USPR)

** 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			Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	11	37.93	0.00	0.00	23.38	9.09	51.37	45.45	25.25	45.45	2.38	0.00	0.00	2.59	2.90
Limited Review:															
Albany WY 2010 AA	1	3.45	0.25	0.00	11.30	0.00	66.08	100.00	22.37	0.00	1.79	0.00	0.00	2.33	0.00
Casper WY 2010 AA	2	6.90	0.00	0.00	18.11	50.00	59.40	50.00	22.49	0.00	0.39	0.00	0.00	0.64	0.00
Northern WY 2010 AA	15	51.72	0.00	0.00	4.38	0.00	83.28	100.00	12.34	0.00	1.32	0.00	0.00	1.51	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** 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			Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	36	31.86	0.00	0.00	23.38	16.67	51.37	47.22	25.25	36.11	0.51	0.00	0.39	0.54	0.50
Limited Review:															
Albany WY 2010 AA	25	22.12	0.25	0.00	11.30	4.00	66.08	64.00	22.37	32.00	1.90	0.00	3.23	1.68	2.34
Casper WY 2010 AA	17	15.04	0.00	0.00	18.11	23.53	59.40	64.71	22.49	11.76	0.30	0.00	0.30	0.38	0.13
Northern WY 2010 AA	35	30.97	0.00	0.00	4.38	0.00	83.28	88.57	12.34	11.43	0.20	0.00	0.00	0.24	0.10

* Based on 2009 Peer Mortgage Data (USPR)

** 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												Geography: WYOMING					Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010				
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 Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Cheyenne WY 2010 AA	44	19.05	0.00	0.00	38.86	40.91	41.25	52.27	19.88	6.82	1.25	0.00	1.41	1.61	0.45						
Limited Review:																					
Albany WY 2010 AA	36	15.58	4.44	0.00	12.63	13.89	71.38	80.56	11.55	5.56	3.90	0.00	3.03	4.67	2.94						
Casper WY 2010 AA	29	12.55	0.00	0.00	35.32	37.93	48.26	48.28	16.42	13.79	0.84	0.00	0.94	0.91	0.77						
Northern WY 2010 AA	122	52.81	0.00	0.00	3.86	0.00	85.61	93.44	10.51	6.56	2.62	0.00	0.00	3.08	1.60						

* Based on 2009 Peer Mortgage Data (USPR)

** 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 (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WYOMING								Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	1	0.70	0.00	0.00	10.31	0.00	59.54	100.00	30.15	0.00	2.27	0.00	0.00	4.35	0.00
Limited Review:															
Albany WY 2010 AA	2	1.40	1.67	0.00	3.33	0.00	89.17	100.00	5.83	0.00	6.25	0.00	0.00	6.25	0.00
Casper WY 2010 AA	2	1.40	0.00	0.00	20.57	0.00	62.86	100.00	16.57	0.00	2.47	0.00	0.00	3.23	0.00
Northern WY 2010 AA	138	96.50	0.00	0.00	1.56	0.00	91.57	97.10	6.66	2.90	31.91	0.00	0.00	37.93	4.44

* Based on 2009 Peer Mortgage Data (USPR)

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

*** Source Data - Dun and Bradstreet (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010							
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**	% Families4	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	61	39.10	17.14	17.65	19.99	25.49	24.55	31.37	38.32	25.49	0.91	1.83	1.45	0.59	0.44
Limited Review:															
Albany WY 2010 AA	45	28.85	23.05	4.55	17.68	31.82	21.38	20.45	37.90	43.18	2.82	2.50	3.73	3.06	2.23
Casper WY 2010 AA	14	8.97	19.04	0.00	19.09	15.38	23.45	30.77	38.43	53.85	0.17	0.00	0.00	0.35	0.21
Northern WY 2010 AA	36	23.08	18.47	0.00	19.22	31.03	23.81	44.83	38.49	24.14	0.35	0.00	0.32	0.64	0.18

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.2% of loans originated and purchased by bank.

4 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		Geography: WYOMING								Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families ⁵	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	11	37.93	17.14	0.00	19.99	22.22	24.55	33.33	38.32	44.44	2.50	0.00	3.70	3.03	2.11
Limited Review:															
Albany WY 2010 AA	1	3.45	23.05	0.00	17.68	0.00	21.38	0.00	37.90	100.00	1.82	0.00	0.00	0.00	4.00
Casper WY 2010 AA	2	6.90	19.04	0.00	19.09	0.00	23.45	50.00	38.43	50.00	0.40	0.00	0.00	1.54	0.00
Northern WY 2010 AA	15	51.72	18.47	26.67	19.22	20.00	23.81	26.67	38.49	26.67	1.38	2.56	1.16	2.42	0.54

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.9% of loans originated and purchased by bank.

⁵ 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			Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010						
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****	% Families6	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne WY 2010 AA	36	31.86	17.14	3.33	19.99	23.33	24.55	30.00	38.32	43.33	0.60	0.00	1.18	0.47	0.56
Limited Review:															
Albany WY 2010 AA	25	22.12	23.05	0.00	17.68	0.00	21.38	21.74	37.90	78.26	2.05	0.00	0.00	1.57	2.84
Casper WY 2010 AA	17	15.04	19.04	18.75	19.09	12.50	23.45	31.25	38.43	37.50	0.31	0.66	0.00	0.16	0.46
Northern WY 2010 AA	35	30.97	18.47	16.13	19.22	25.81	23.81	19.35	38.49	38.71	0.18	0.00	0.20	0.39	0.06

* Based on 2009 Peer Mortgage Data (USPR)

** 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 11.5% of loans originated and purchased by bank.

6 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				Geography: WYOMING		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010			
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 WY 2010 AA	44	19.05	75.79	34.09	59.09	18.18	22.73	1.25	1.75
Limited Review:									
Albany WY 2010 AA	36	15.58	78.35	50.00	69.44	11.11	19.44	3.90	7.22
Casper WY 2010 AA	29	12.55	75.28	62.07	75.86	13.79	10.34	0.84	1.46
Northern WY 2010 AA	122	52.81	76.87	62.30	69.67	17.21	13.11	2.62	4.73

* Based on 2009 Peer Mortgage Data (USPR)

** 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 - 2010).

**** 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 3.03% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: WYOMING		Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Cheyenne WY 2010 AA	1	0.70	96.18	100.00	100.00	0.00	0.00	2.27	2.94
Limited Review:									
Albany WY 2010 AA	2	1.40	96.67	100.00	100.00	0.00	0.00	6.25	8.33
Casper WY 2010 AA	2	1.40	94.86	100.00	100.00	0.00	0.00	2.47	3.51
Northern WY 2010 AA	138	96.50	96.77	89.86	65.94	25.36	8.70	31.91	38.76

* Based on 2009 Peer Mortgage Data (USPR)

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.99% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010			
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 WY 2010 AA	0	0	26	57	26	57	69.67	0	0
Limited Review:									
Albany WY 2010 AA	0	0	13	6	13	6	6.98	0	0
Casper WY 2010 AA	0	0	8	7	8	7	8.35	0	0
Northern WY 2010 AA	0	0	22	12	22	12	15.00	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 TO JUNE 30, 2010								Geography: WYOMING				Evaluation Period: JANUARY 1, 2008					
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	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 WY 2010 AA	43.72	4	44.44	0.00	25.00	25.00	50.00	1	0	0	0	0	1	0.00	30.33	48.51	21.16
Limited Review:																	
Albany WY 2010 AA	12.08	1	11.11	0.00	0.00	100.0 0	0.00	0	0	0	0	0	0	10.45	12.86	59.31	17.38
Casper WY 2010 AA	12.38	1	11.11	0.00	100.0 0	0.00	0.00	0	0	0	0	0	0	0.00	20.30	56.97	22.73
Northern WY 2010 AA	31.82	3	33.33	0.00	0.00	100.0 0	0.00	0	0	0	0	0	0	0.00	4.83	82.86	12.30

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO JUNE 30, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cheyenne WY 2010 AA	10.34	4	10.53	0.00	25.00	25.00	50.00	14	20.90	0.00	57.14	28.57	14.29	0.00	30.33	48.51	21.16
Limited Review:																	
Albany WY 2010 AA	2.86	1	2.63	0.00	0.00	100.00	0.00	4	5.97	0.00	25.00	75.00	0.00	10.45	12.86	59.31	17.38
Casper WY 2010 AA	2.93	1	2.63	0.00	100.00	0.00	0.00	1	1.49	0.00	100.00	0.00	0.00	0.00	20.30	56.97	22.73
Northern WY 2010 AA	7.52	3	7.89	0.00	0.00	100.00	0.00	3	4.48	0.00	0.00	100.00	0.00	0.00	4.83	82.86	12.30