



PUBLIC DISCLOSURE

April 12, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Wyoming Community Bank
RSSD# 2806840**

**1700 North Federal Boulevard
Riverton, Wyoming 82501**

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Wyoming Community Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- An excellent distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among businesses and farms of different sizes.
- Neither the bank nor this Federal Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's Fremont County AA. Due to the makeup of the bank's loan portfolio, small business and small farm loans were weighted equally for purposes of the CRA evaluation. The following data was reviewed:

- The bank's 19 quarter average NLTD ratio,
- A statistical sample of 74 small business loans selected from a universe of 116 loans originated between July 1, 2020 and December 31, 2020, and
- A statistical sample of 56 small farm loans selected from a universe of 78 loans originated between July 1, 2020 and December 31, 2020.

DESCRIPTION OF INSTITUTION

The Bank is a community bank headquartered in Riverton, Wyoming. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Wyoming National Bancorporation, Inc.
- The bank has total assets of \$185.3 million (MM) as of December 31, 2020.
- In addition to its main office in Riverton, the bank operates two additional full-service branches located in Lander and Dubois, Wyoming. The branch in Dubois was converted from a loan production office after the CRA review period.
- The bank owns 100.0 percent of Wyoming Community Finance, Inc. (WCF), a subsidiary focused on consumer loan financing located in Riverton, Wyoming.

- The bank operates five cash-only automated teller machines: two are located in Riverton (one at the main office and one at the WCF location); two are located in Lander (one at the branch and one at the Lander Convention Center); and one is located at the Dubois Branch.
- The bank is primarily a commercial lender, with agricultural and residential real estate lending also representing key business lines.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF DECEMBER 31, 2020		
Loan Type	\$(000)	%
Commercial	45,217	45.0
Agricultural	24,856	24.7
Residential Real Estate	19,106	19.0
Consumer	7,521	7.5
Other	3,876	3.9
Gross Loans	100,576	100.0

Note: Percentages may not total 100.0 percent due to rounding.

The bank was rated Satisfactory under the CRA at its June 13, 2016 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank’s AA is comprised of Fremont County in its entirety (see Appendix A for an AA map).

- The AA’s ten census tracts consist of two moderate- and eight middle-income census tracts.
- According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank maintains a 17.5 percent deposit market share and ranks second out of seven FDIC-insured depository institutions operating within the AA.
- Interviews with community contacts were utilized to provide context behind local demographic and economic conditions. Two interviews were previously conducted as part of the public evaluation of another financial institution in the area, and one interview was performed during this evaluation. All three community contacts represent organizations focused on economic development in Fremont County.

TABLE 2 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Fremont County AA	40,123	40,755	1.6
Non-MSA Wyoming	396,438	404,237	2.0
State of Wyoming	563,626	579,679	2.8

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- The main population centers in the AA are the cities of Riverton and Lander, while other areas are sparsely populated.

TABLE 3 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Fremont County AA	60,471	64,694	7.0
Non-MSA Wyoming	73,003	72,833	(0.2)
State of Wyoming	71,832	73,194	1.9

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

Note: Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

- Median Family Income in the AA has increased but is still below the figure for other nonmetropolitan areas of Wyoming and the state as a whole. A community representative stated there is limited opportunity for employment in the county, and available jobs are generally low wage.
- The percentage of households living below the poverty level in Fremont County, at 11.8 percent is slightly above the State of Wyoming's average of 10.8 percent. A community contact stated that a lack of businesses offering stable employment in the area contributes to the poverty level.

TABLE 4 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Fremont County AA	154,432	186,521	20.8	567	708	24.9
Non-MSA Wyoming	175,520	200,821	14.4	670	767	14.5
State of Wyoming	174,000	194,800	12.0	666	789	18.5

*Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey*

- Median housing values and gross rents in the AA have increased at a higher rate compared to the rate in other nonmetropolitan areas of Wyoming and the state as a whole.
- A community contact stated that housing prices have increased in northwest Fremont County, as demand has increased for less expensive properties than those located in neighboring Jackson, Wyoming. The contact also stated that Fremont County has little inventory of affordable housing for lower-income individuals.

TABLE 5 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Fremont County AA	5.6	7.2	5.5	5.0	4.4
Non-MSA Wyoming	4.3	5.3	4.1	3.8	3.6
State of Wyoming	4.3	5.3	4.2	3.9	3.6

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Schools, Indian health services, road construction businesses, and casinos represent the major employers in the county according to a community contact.
- Additionally, a community contact stated the recent recession has made it difficult for individuals in Fremont County to commit enough start-up money to be approved for small business loans.
- Two community contacts attributed the impact of the recent recession on the local economy to Fremont County's dependence on the mineral extraction sector, which has suffered a downturn in recent years due to a fire at a local natural gas plant. The downturn resulted in both a loss of jobs and lower business investment in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and location. The bank's NLTD ratio is within the range of ratios of comparable institutions, which is considered reasonable.

TABLE 6 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			19-Quarter Average
Wyoming Community Bank	Riverton, Wyoming	185,318	67.8
Bank of Commerce	Rawlins, Wyoming	163,112	61.6
RNB State Bank	Rawlins, Wyoming	219,023	60.7
Central Bank & Trust	Lander, Wyoming	201,196	69.1

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank's loans, by number and dollar, are originated inside the AA.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Small Business Loans	61	\$8,415	82.4	87.2	13	\$1,232	17.6	12.8
Small Farm Loans	48	\$3,822	85.7	80.2	8	\$946	14.3	19.8
Total Loans	109	\$12,237	83.8	84.9	21	\$2,178	16.2	15.1

Note: Percentages may not add to 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts. The bank's geographic distribution of loans reflects excellent dispersion among the different census tracts within the AA.

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending to businesses located in moderate-income census tracts exceeded the percentage of businesses operating in moderate-income census tracts. Loan dispersion was also evaluated, and no significant gaps were identified.

TABLE 8 DISTRIBUTION OF 2020 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY					
Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	12	973	19.7	11.6	13.5
Middle	49	7,442	80.3	88.4	86.5
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Small Farm Lending

The geographic distribution of small farm lending is excellent. The bank's lending to farms located in moderate-income census tracts exceeded the percentage of farms operating in moderate-income census tracts. Loan dispersion was also evaluated, and no significant gaps were identified.

**TABLE 9
DISTRIBUTION OF 2020 SMALL FARM LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	8	394	16.7	10.3	9.7
Middle	40	3,429	83.3	89.7	90.3
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Lending to Businesses and Farms of Different Revenue Sizes

This performance criterion evaluates the bank’s lending to businesses and farms of different revenue sizes. The bank’s lending has a reasonable penetration among businesses and farms of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with revenues of \$1 MM or less is comparable to the percentage of small businesses in the AA. The bank’s opportunity to originate loans to small businesses may be limited by AA economic factors. As noted above, Fremont County has experienced an economic downturn in the last several years resulting in a lower level of business investments in the AA. Additionally, one community contact stated the rural location of Fremont County makes it challenging to attract and retain small businesses. Further, although the bank does not report CRA data, a review of 2020 aggregate small business lending data reported by all CRA filers in the AA indicated that 51.2 percent of loans by number and 40.0 percent by dollar were made to small businesses during the review period. While institutions included in the aggregate lending data are not a direct comparison as the bank is not a CRA reporter, these aggregate lending levels are reflective of the lower overall demand for credit from small businesses in the AA.

**TABLE 10
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	38	3,668	62.3	43.6	90.6
Over \$1 Million	20	4,692	32.8	55.8	7.8
Not Known	3	55	4.9	0.7	1.6
Total	61	8,415	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	41	1,566	67.2	18.6	
\$100,001 – \$250,000	9	1,564	14.8	18.6	
\$250,001 – \$1 Million	11	5,285	18.0	62.8	
Total	61	8,415	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	28	912	73.7	24.9	
\$100,001 – \$250,000	5	829	13.2	22.6	
\$250,001 – \$1 Million	5	1,927	13.2	52.5	
Total	38	3,668	100.0	100.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011 - 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank’s lending to farms with revenues of \$1MM or less was comparable to the percentage of small farms in the AA.

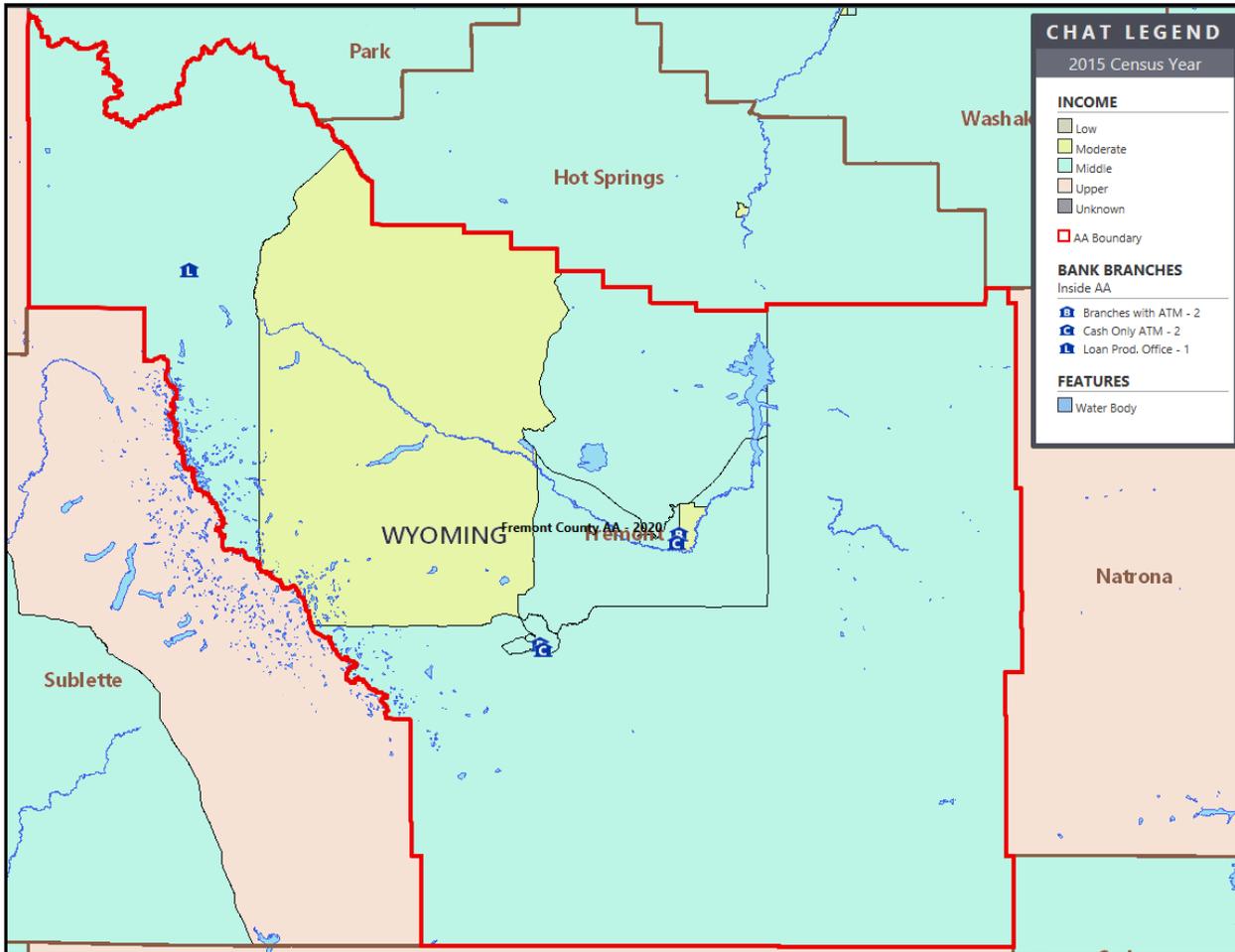
**TABLE 11
DISTRIBUTION OF 2020 SMALL FARM LENDING
BY REVENUE SIZE OF FARMS**

	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	44	3,702	91.7	96.9	98.7
Over \$1 Million	0	0	0.0	0.0	1.3
Not Known	4	120	8.3	3.1	0.0
Total	48	3,822	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	36	1,424	75.0	37.3	
\$100,001 – \$250,000	9	1,523	18.8	39.8	
\$250,001 – \$500,000	3	875	6.3	22.9	
Total	48	3,822	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	32	1,304	72.7	35.2	
\$100,001 – \$250,000	9	1,523	20.5	41.1	
\$250,001 – \$500,000	3	875	6.8	23.6	
Total	44	3,702	100.0	100.0	
<i>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011 - 2015 U.S. Census Bureau: American Community Survey</i> NOTE: Percentages may not add up to 100.0 due to rounding.					

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank’s fair lending activities was conducted during the examination to determine compliance with the substantive provisions of anti-discrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 FREMONT COUNTY 2020 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,423	23.9
Moderate	2	20.0	2,142	21.2	308	14.4	2,077	20.5
Middle	8	80.0	7,976	78.8	701	8.8	2,271	22.4
Upper	0	0.0	0	0.0	0	0.0	3,347	33.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10	100.0	10,118	100.0	1,009	10.0	10,118	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,513	2,117	19.5	60.3	1,068	30.4	328	9.3
Middle	14,210	8,758	80.5	61.6	3,387	23.8	2,065	14.5
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	17,723	10,875	100.0	61.4	4,455	25.1	2,393	13.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	260	13.5	226	12.9	27	17.9	7	22.6
Middle	1,669	86.5	1,521	87.1	124	82.1	24	77.4
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,929	100.0	1,747	100.0	151	100.0	31	100.0
Percentage of Total Businesses:			90.6		7.8		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	15	9.7	15	9.8	0	0.0	0	0.0
Middle	140	90.3	138	90.2	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	155	100.0	153	100.0	2	100.0	0	0.0
Percentage of Total Farms:			98.7		1.3		0.0	
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

APPENDIX C – GLOSSARY

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 metropolitan area/assessment area.

Census tract: 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 statistical 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 nonrelatives 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-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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-scope review: Performance is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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