



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

March 08, 2004

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Rawlins National Bank
Charter Number 5413**

**220 5th Street
Rawlins, WY 82301**

**Comptroller of the Currency
ADC-Salt Lake City (Montana, Utah, Wyoming)
2795 East Cottonwood Parkway Suite 390
Salt Lake City, UT 84121**

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.

INSTITUTION'S CRA RATING

This institution is rated Satisfactory.

- The Rawlins National Bank (RNB) has an excellent record of lending to borrowers with different incomes.

The bank's distribution of loans to low- and moderate-income borrowers exceeds demographic comparators. Based on the 30 consumer borrowers sampled, the bank's distribution of loans to low- and moderate-income individuals greatly exceeded the percentage of assessment area (AA) families in the low- and moderate-income categories. RNB granted nearly 57 percent of its consumer loans to low- and moderate-income borrowers, while demographic data shows that only 42 percent of families in the AA fall into the low- and moderate-income category. We obtained the demographic information from the 2000 United States Census.

The distribution of loans to businesses of different sizes is difficult to compare. More than 26 percent of AA businesses did not identify revenue size. Based on our sample, the bank makes 83 percent of its business loans to small businesses. This compares favorably with the demographic comparator of 71 percent, but compares unfavorably with the percentage of reporting businesses that are small businesses (96 percent). The large percentage of businesses not reporting revenue size diminishes the usefulness of this comparison. We obtained the demographic information from 2002 Dunn and Bradstreet reports.

- The bank originated a majority of its loans in the AA. Based on our sample of consumer loans, RNB originated 90 percent of its loans both by number and dollar amount within its AA. Based on our sample of business loans, the bank originated 77 percent of its loans by number and 65 percent by dollar amount within its AA.
- The bank's average loan-to-deposit ratio since the last examination is good.

The bank's average loan-to-deposit ratio over the past 18 quarters exceeds the standard for satisfactory performance. The bank's average loan-to-deposit ratio of 69 percent compares favorably to the ratios of similarly situated banks in the AA. Competing banks' ratios ranged from 46 percent to 74 percent and averaged 63 percent.

- An analysis of the geographic distribution of loans was not applicable because the AA's five census tracts are all categorized as middle-income geographies.
- RNB did not receive any consumer complaints about its performance in helping to meet the credit needs of the AA during the evaluation period.
- We found no evidence of illegal discrimination or other illegal credit practices.

DESCRIPTION OF INSTITUTION

The Rawlins National Bank is a \$120 million institution located in south central Wyoming. The bank's primary loan product by number is consumer loans, and primary loan product by dollar amount is business purpose loans. RNB received a "Satisfactory" rating at the last CRA examination dated August 16, 1999. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the assessment area. Refer to the bank's *CRA Public File* for more information.

DESCRIPTION OF CARBON COUNTY, WYOMING

RNB's AA consists of Carbon County, Wyoming, and is not part of a metropolitan statistical area. The AA is comprised of five middle-income census tracts. For 2003, the U.S. Department of Housing and Urban Development (HUD) estimates the non-metropolitan median income for Wyoming at \$50,700. The largest employers in the area are Wyoming State Penitentiary and the Sinclair oil refinery. RNB's competition in the AA comes from a regional bank branch and a state chartered community bank, and a local credit union.

We contacted a community development official in the assessment area to discuss economic conditions and credit needs. This individual stated that the local economy is stable, and the financial institutions are generally meeting the credit needs of the community.

Please refer to the bank's *CRA Public File* for more information.