



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

April 7, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Rock Springs National Bank
Charter Number 4755**

**333 Broadway
Rock Springs, Wyoming 82901**

**Office of the Comptroller of the Currency
ADC – Montana, Wyoming, Idaho & Utah
2795 Cottonwood Parkway, Suite 390
Salt Lake City, Utah 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 Rock Springs National Bank (RSNB) has a satisfactory record of lending to individuals of different income levels, and to businesses of different sizes.

The distribution of residential real estate borrowers is satisfactory. Based on 20 borrowers sampled, the bank's distribution of loans to families at the low-and moderate-income (LMI) levels reasonably mirrored the demographic data used for comparison. The sample included loans originated over the last three years. Demographic information was obtained from the 1990 United States Census.

The distribution of loans to commercial borrowers reflects reasonable penetration of businesses of different sizes. Based on the 20 borrowers sampled, the bank's distribution of loans to businesses with revenues less than \$1 million approximates that of the demographic information. The sample included loans originated over the last three years. Demographic information was obtained from 2002 Dunn and Bradstreet data.

- RSNB originated a majority of its loans in the assessment area.

RSNB originated 87% by number and 72% by dollar amount within its assessment area for agricultural, commercial, residential real estate, and consumer loans sampled. The sample included all loans originated in 2002.

- The bank's quarterly average loan-to-deposit ratio since the last examination is reasonable.

RSNB's average loan-to-deposit ratio over the past thirteen quarters, ending December 31, 2002, met the standard for satisfactory performance. The bank's average ratio of 45% satisfactorily compares to ratios of similarly situated banks in Wyoming. The average loan-to-deposit ratio for similarly situated institutions was 48%.

- RSNB did not receive any consumer complaints about its performance in helping to meet the credit needs of the assessment area during the evaluation period.
- An analysis of the 2000, 2001, and 2002 public comments and complaint information was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted with the Community Reinvestment Act (CRA) evaluation this year. The latest comprehensive fair lending exam was performed in 1998.
- An analysis of the geographic distribution of loans was not applicable as the assessment area contained only one moderate-income Block Numbering Area (BNA). The BNA only has 20 families living in it, representing 0.17% of total families in the assessment area. The extremely small size of the BNA made a geographic analysis impractical.

DESCRIPTION OF INSTITUTION

RSNB is a \$235 million institution located in southern Wyoming. RSNB received a “Satisfactory” CRA rating at the last examination dated September 21, 1998. The bank’s primary loan products consist of commercial and residential real estate loans. RSNB operates a full-service branch and a Wal-Mart store branch in Rock Springs in addition to the main bank facility. They also operate six automated teller machines. There are no legal or financial factors that impede the bank’s ability to help meet the credit needs of the assessment area. Please refer to the bank’s *CRA Public File* for more information.

DESCRIPTION OF ASSESSMENT AREA

The bank’s assessment area encompasses all of Sweetwater and Sublette counties. This assessment area is comprised of one moderate-income, eight middle-income, and eight upper-income block numbering areas. The assessment area does not arbitrarily exclude any low- or moderate-income areas. Mining and oil/gas extraction industries dominate the local economy.

We made one community contact with a county wide economic development organization. The contact indicated that small business loans and financing for affordable housing constitute the primary credit needs. The contact perceives that the local financial institutions meet the business and housing needs of the community. The contact indicated that the economy is stable.

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