

PUBLIC DISCLOSURE

March 18, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Interstate Bank
401 North 31st Street
Billings, Montana 59101
RSSD 659855

**Federal Reserve Bank of Minneapolis
90 Hennepin Avenue, P.O. Box 291
Minneapolis, Minnesota 55480-0291**

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 the safe 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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Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this public evaluation.

The following abbreviations may be used throughout this performance evaluation:

Air Force Base	AFB
American Community Survey	ACS
First Interstate BancSystem, Inc., Billings, Montana	BancSystem
First Interstate Bank, Billings, Montana	bank
Bank of the Cascades	BOTC
Community Reinvestment Act	CRA
Dun & Bradstreet	D&B
Federal Deposit Insurance Corporation	FDIC
Federal Financial Institutions Examination Council	FFIEC
Federal Housing Administration	FHA
Federal Home Loan Bank	FHLB
First Interstate BancSystem Foundation	foundation
Federal National Mortgage Association	Fannie Mae
U.S. Department of Agriculture Farm Service Agency	FSA
Home Mortgage Disclosure Act	HMDA
District XI Human Resource Council, Inc.	HRC
Federal Home Loan Bank of Des Moines Home\$tart Savings Program	Home\$tart
U.S. Department of Housing and Urban Development	HUD
Low-Income Housing Tax Credit	LIHTC
Montana Board of Housing	MBOH
Mortgage-backed securities	MBS
Metropolitan Statistical Area	MSA
New Markets Tax Credit	NMTC
Office of Management and Budget	OMB
U.S. Department of Agriculture Rural Development	RD
Report of Condition	ROC
U.S. Small Business Administration	SBA
South Dakota Housing Development Authority	SDHDA
U.S. Department of Veterans Affairs	VA
Wyoming Community Development Authority	WCDA

INSTITUTION RATING

INSTITUTION’S CRA RATING: First Interstate Bank’s rating is Outstanding.

Examiners evaluated the CRA performance of First Interstate Bank, Billings, Montana (bank), using the Large Bank CRA Examination Procedures. The following table shows the bank’s performance with respect to the Lending, Investment, and Service Tests.

First Interstate Bank Performance Tests			
<i>Performance Levels</i>	<i>Lending Test*</i>	<i>Investment Test</i>	<i>Service Test</i>
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
*Examiners assigned more weight to the Lending Test than to the Investment and Service Tests for determining the overall rating, in accordance with the Large Bank CRA Examination Procedures.			

Major factors supporting the institution’s rating include the following:

Lending Test

- The bank’s lending activity shows excellent responsiveness to credit needs throughout its assessment areas.
- Overall, the bank’s distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the bank’s distribution of loans is good throughout the assessment areas, including low- and moderate-income census tracts and nonmetropolitan middle-income census tracts classified as distressed and/or underserved.
- The bank is a leader in making community development loans.
- The bank made a majority of loans within its Montana, Wyoming, and South Dakota assessment areas.
- The bank makes extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test

- The bank’s overall level of qualified investments in the form of securities and donations is significant.
- The bank’s qualified investments exhibit good responsiveness to local credit and community development needs.

Service Test

- The bank provides a relatively high level of community development services.
- Retail banking services are readily accessible to the bank’s geographies and to residents, businesses, and farms throughout the assessment areas. Services do not vary in a way that inconveniences low- and moderate-income areas or individuals.
- Changes in the bank’s network of branches, drive-up facilities, and ATMs did not adversely affect the accessibility of the bank’s products and services.

INSTITUTION

DESCRIPTION OF INSTITUTION

General. First Interstate Bank is an interstate bank with headquarters in Billings, Montana, and assets of \$13.4 billion as of March 31, 2019. The bank operates 81 offices in Montana, Wyoming, and South Dakota. The bank continues to be highly effective in meeting the credit and community development needs of the residents, businesses, and farms throughout its assessment areas. No financial constraints or legal impediments prevent the bank from serving the credit needs of its assessment areas. The bank's CRA rating was Outstanding at the previous evaluation, dated June 6, 2016.

Structure. First Interstate BancSystem, Inc., Billings, Montana (BancSystem), wholly owns First Interstate Bank. BancSystem is a financial and bank holding company and publicly trades its stock on the NASDAQ stock exchange with the stock symbol FIBK. BancSystem also owns the following:

- First Interstate Statutory Trust VI, Billings, Montana
- First Interstate Statutory Trust V, Billings, Montana
- First Interstate Capital Trust IV, Billings, Montana
- First Interstate Statutory Trust III, Billings, Montana
- First Interstate Capital Trust II, Billings, Montana
- First Interstate Statutory Trust I, Billings, Montana
- Northwest Bancorporation Capital Trust I, Spokane, Washington
- Mountain South, LLC, Missoula, Montana

BancSystem acquired and merged with Flathead Bank of Bigfork, Bigfork, Montana, on August 12, 2016, which was wholly owned by Flathead Holding Company of Bigfork, also in Bigfork. In addition, BancSystem acquired Cascade Bancorp, a Bend, Oregon-based bank holding company operating one subsidiary bank, Bank of the Cascades (BOTC), also based in Bend on May 30, 2017.¹ First Interstate Bank merged with BOTC effective August 11, 2017.

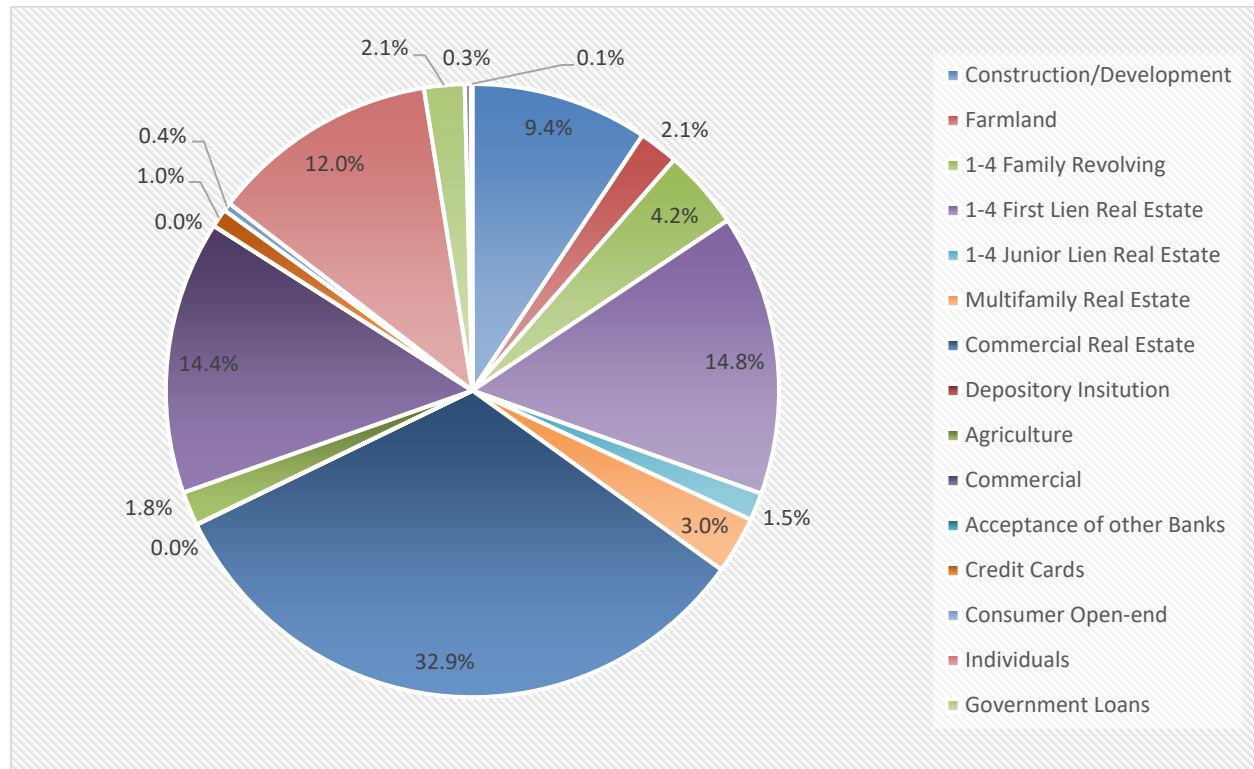
First Interstate BancSystem Foundation (foundation) is the charitable affiliate of BancSystem. The foundation provides financial assistance and leadership to nonprofit organizations and charitable endeavors throughout the communities the bank serves. BancSystem provides funding to the foundation through allocation of 2.0% of pretax profits for the foundation to donate each year.

Loan Portfolio. According to the December 31, 2017, Report of Condition (ROC), the bank's \$7.6 billion loan portfolio consists of 59.7% commercial, 20.5% residential real estate, 13.4% consumer, 3.9% agricultural, and 2.6% all other loans.² Total assets increased by 39.7% and gross loans increased by 45.2% since the 2016 evaluation. As mentioned, the bank acquired BOTC in mid-August 2017, which contributed to a large increase in assets and loans. While loans increased, the overall composition of the loan portfolio remained relatively stable. The following chart illustrates the loan portfolio composition in detail, based on the December 31, 2017, ROC data.

¹ Lending and community development activity from the acquired branches is not part of this CRA evaluation because it was merged with the bank for a small part of the evaluation period (mid-August 2017 to December 2017).

² Note: Because the percentages presented in the report are rounded to the nearest tenth, some data may not total 100.0%.

Loan Portfolio Composition as of December 31, 2017



Credit Products. To meet the credit needs of the residents, businesses, and farms in its assessment areas, the bank offers a wide variety of residential real estate, consumer, commercial, and agricultural loan products. Loan products include traditional closed- and open-end loans. The bank also purchases indirect consumer automobile loans.

In addition to conventional loan programs, the bank offers flexible loan and grant programs in coordination with other entities, especially for affordable mortgages. For small business and small farm entities, the bank offers SBA and FSA loans. For a list of programs the bank participates in and additional information on these programs, refer to the Innovative and Flexible Lending Practices section on page 10 of this report.

Offices. The bank operates a network of branches, ATMs, and drive-up facilities in Montana, Wyoming, and South Dakota. The bank operates 47 branches in Montana, 19 branches in Wyoming, and 15 branches in South Dakota.³ During the evaluation period, some changes occurred in the bank’s branch and ATM network. Details on changes are discussed in each state section and each individual assessment area, in the Service Test section under the Retail Banking Services heading, and in the Assessment Area Information table below. Finally, in this Institution section under the Retail Banking Services heading, there are details on the bank’s retail delivery systems.

Assessment Areas. The bank operated in 21 assessment areas during the evaluation period of 2016 and 2017. The number of assessment areas increased by two since the previous evaluation, due to the merger with Flathead Bank of Bigfork in 2016. As shown in the table below, the bank has 11 assessment areas in Montana, 6 assessment areas in Wyoming, and 4 assessment areas in South Dakota. The bank operates in several MSAs. The table provides a general overview of each assessment area during the evaluation

³ These numbers include the bank’s drive-up banking facilities.

period. Additional details on assessment areas and branches and ATMs are in the applicable assessment area sections.

Assessment Area Information		
<i>Assessment Area Name</i>	<i># of Offices by City</i>	<i>Geographical Description</i>
State of Montana		
Billings MSA	Billings (6), Red Lodge, Laurel	Yellowstone, Carbon, and Golden Valley counties
Great Falls MSA	Great Falls (3)	Cascade County
Missoula MSA	Missoula (4)	Missoula County
Bozeman	Bozeman (4), Belgrade, Gardiner, Livingston	Gallatin County and most of Park County
Hamilton	Hamilton	Ravalli County
Hardin/Miles City	Hardin, Miles City, Colstrip, Lame Deer	Big Horn, Custer, and Rosebud counties
Helena	Helena (6)	Lewis and Clark County
Kalispell	Kalispell (3), Whitefish, Polson, Eureka, Bigfork	Flathead, Lake, and Lincoln counties
Absarokee/Columbus	Absarokee, Columbus	Stillwater County
Cut Bank ⁴ (2017 only)	Cut Bank	Glacier County (except one tract)
Ennis (2017 only)	Ennis	Madison County
State of Wyoming		
Casper MSA	Casper (3), Mills	Natrona County
Cheyenne MSA	Cheyenne (2)	Laramie County
Jackson	Jackson (3)	Teton County
Laramie	Laramie (2)	Albany County
Riverton	Riverton, Lander	Fremont County
Sheridan	Sheridan (2), Gillette (2), Buffalo	Sheridan, Johnson, and Campbell counties
State of South Dakota		
Rapid City MSA	Rapid City (2), Hill City, New Underwood, Wall, Sturgis, Custer	Pennington, Meade, and Custer counties
Belle Fourche	Belle Fourche, Deadwood, Lead, Spearfish (2)	Butte and Lawrence counties
Edgemont	Custer, Edgemont, Hot Springs	Fall River County
Sioux Falls MSA (2016 only) ⁵	Sioux Falls	Minnehaha County and part of Lincoln County

SCOPE OF EVALUATION

To understand the bank's CRA performance, examiners evaluated the bank's HMDA, consumer, small business, and small farm loans for 2016 and 2017. Examiners analyzed the lending performance in each assessment area by focusing on the predominant loan types (HMDA, consumer, small business, and/or small farm loans) for each assessment area. Examiners also evaluated the bank's community development loans, qualified investments, and community development services for both years.

⁴The Cut Bank and Ennis assessment areas are new since the previous examination due to the acquisition of branches in Cut Bank and Ennis through the Flathead Bank of Bigfork merger in August 2016.

⁵ The Sioux Falls branch opened in April 2016 and closed in June 2016; therefore, this assessment area was eliminated after the branch closed.

Examiners selected five of the bank's assessment areas for full-scope reviews. To select full-scope assessment areas, examiners reviewed factors such as loan volume, deposit market share, branch size and location, length of time since the last full-scope review, and community development activity. For interstate banks, examiners must conduct a full-scope review of at least one assessment area in each state. A full-scope review requires examiners to evaluate the bank's quantitative and qualitative performance using the following criteria: lending activity, lending to borrowers of different income levels and to businesses and farms of different sizes, geographic distribution of loans throughout the assessment area, community development lending, flexible and/or innovative lending practices, qualified investments, retail services, and community development services. The other assessment areas receive limited-scope reviews, in which examiners analyze quantitative data about the bank's lending, investments, and services. The evaluation of the bank's performance in the Sioux Falls MSA is for 2016 only, because the bank closed the limited-service branch in Sioux Falls in June 2016.

The assessment areas selected for full-scope reviews represent 40.2% of the bank's loans by dollar amount and 39.3% by number of loans, according to loan data from January 1, 2016, to December 31, 2017. Examiners conducted full-scope reviews of the following assessment areas:

- Billings, Montana, MSA assessment area
- Kalispell, Montana, assessment area
- Cheyenne, Wyoming, MSA assessment area
- Riverton, Wyoming, assessment area
- Rapid City, South Dakota, MSA assessment area

In determining the overall CRA rating, examiners placed the greatest weight on the bank's activities in its Montana assessment areas because the majority of the bank's lending occurs in these assessment areas. During the evaluation period, the bank extended, by number, 51.5% of its HMDA, consumer, small business, small business secured by real estate, and small farm loans in the Montana assessment areas.⁶ The percentages for the Wyoming and South Dakota assessment areas were 28.7% and 19.9%, respectively. Examiners placed the least weight on the bank's performance in South Dakota. Finally, examiners generally placed the greatest weight on the Billings assessment area because it is the most active of the full-scope assessment areas.

Because of the bank's size and its branches in MSAs, HMDA requires the bank to report home purchase, refinance, home improvement, and multifamily loan applications. The bank must report small business, small farm, and community development loans because of its asset size. Examiners compared the bank's HMDA and CRA lending performance to that of aggregate lenders that report loans originated or purchased in the assessment areas. Examiners also based the analysis on the bank's consumer-related loans for 2016 and 2017, because the bank chose to report this optional loan data. While the bank reported small business loans secured by real estate, which is also optional data, examiners did not analyze the data because this loan type is not a significant product for the bank.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. For HMDA loans, examiners relied on demographic information, primarily from the 2010 U.S. Census or 2017 FFIEC adjusted census data, to understand the income levels and geographic locations of the families and housing units in the assessment areas.⁷ For small business and small farm loans, examiners used Dun & Bradstreet (D&B) data for the applicable year. D&B collects and publishes this self-reported data concerning the revenues and locations of local businesses and farms. The

⁶The figure is based on the total number of loans extended inside the bank's assessment areas during the two-year evaluation period.

⁷The FFIEC adjusted census data is based on decennial U.S. Census data and American Community Survey five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Instead, examiners reviewed the demographic data to provide a context for the bank's performance, along with the information obtained from bank management and community contacts.

As part of this evaluation, examiners had discussions with bank management and community contacts regarding local economic conditions, demographic characteristics, the performance of local financial institutions, and opportunities to participate in community development activities. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition. Examiners considered these factors and the size and financial condition of the bank when evaluating its performance. The contacts did not identify any unmet credit needs in the bank's assessment areas.

The full-scope assessment area sections of this public evaluation describe each assessment area's performance context. The bank's assessment areas stretch across Montana and Wyoming and include portions of western, southwestern, and southeastern South Dakota. Some are rural areas, and some are metropolitan areas. The economic characteristics of the assessment areas vary, which affects loan demand and community development opportunities. Most assessment areas had stable or growing economies, although some areas experienced some losses because of a downturn in sectors of the local economies

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA rating is Outstanding, based on the ratings for the Lending, Investment, and Service Tests. Overall, the bank did an excellent job of serving the credit and community development needs of its assessment areas in Montana, Wyoming, and South Dakota.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity
- Lending to borrowers of different income levels and to businesses and farms of different sizes
- Geographic distribution of loans
- Lending inside the bank's assessment areas
- Community development lending
- Use of innovative and/or flexible lending practices

To evaluate the bank's performance, examiners placed more weight on the criteria of borrower distribution and geographic distribution than on lending activity and lending inside the bank's assessment areas. Further, examiners generally assigned more weight to lending to borrowers of different income levels and to businesses and farms of different sizes than to the geographic distribution of loans, unless there were low- and/or moderate-income census tracts in the assessment area. Finally, the bank's overall extensive use of innovative and/or flexible lending practices contributed to the Lending Test rating.

Examiners evaluated the bank's qualified investments and its retail and community development services under the Investment and Service Tests, respectively.

LENDING TEST

The bank's Lending Test rating is outstanding. Overall, the bank's lending to low- and moderate-income borrowers and to small businesses and small farms is excellent. The geographic distribution and dispersion of loans is good. The bank is a leader in originating community development loans, and it makes extensive use of innovative and/or flexible lending practices. The bank's lending activity shows

excellent responsiveness to credit needs throughout its assessment areas. Finally, the bank made a majority of its loans inside its assessment areas.

The bank is an interstate institution, but it does not operate in any multistate MSAs. The regulation requires a separate analysis for each state in which the bank operates. This analysis must include at least one assessment area from each state. However, examiners evaluate the overall lending activity and the concentration of lending in the assessment areas at the institution level; both criteria are discussed below. For a detailed discussion of other Lending Test criteria, see the individual assessment area sections of this evaluation. For the limited-scope assessment areas, please see Appendix D for tables displaying the borrower and geographic distributions, as well as demographic and aggregate lender information.

Lending Activity

The bank's lending activity demonstrates excellent responsiveness to the credit needs of the assessment areas. The Summary of Lending Activity table shows the bank's HMDA and CRA lending activity from January 1, 2016, to December 31, 2017, in the assessment areas. The table shows the product volume by number and dollar amount.

Summary of 2016 to 2017 Lending Activity				
<i>Loan Types</i>	#	%	\$(000)	%
Home Equity	3,595	8.4	331,555	28.1
Motor Vehicle	23,009	53.9	560,302	47.4
Other – Secured	11,913	27.9	246,681	20.9
Other – Unsecured	4,138	9.7	42,757	3.6
Other Loan Data	1	0.0	5	0.0
Total Consumer-Related	42,656	65.7	1,181,300	27.9
Home Improvement	1,080	10.3	84,896	4.1
Home Purchase	6,584	62.8	1,401,231	66.8
Multi-Family Housing	76	0.7	44,540	2.1
Refinancing	2,753	26.2	567,359	27.0
Total HMDA-Related	10,493	16.2	2,098,026	49.5
Small Business Secured by Real Estate	374	4.0	52,110	6.7
Small Business	8,900	96.0	730,338	93.3
Total Small Business-Related	9,274	14.3	782,448	18.5
Total Small Farm	2,529	3.9	174,059	4.1
TOTAL LOANS	64,952	100.0	4,235,833	100.0

The bank's lending varies somewhat in different assessment areas, depending on the market and economic factors. For example, the bank extends a higher number of small farm loans in some of its more rural assessment areas. In most assessment areas, the bank is among the top five HMDA and CRA lenders, based on aggregate lending data. Further, the bank is the HMDA market leader in many assessment areas and the CRA market leader in some assessment areas. Overall, the bank's lending activities show excellent responsiveness to local credit needs in the Montana, Wyoming, and South Dakota assessment areas. For detailed information regarding the bank's lending activity, see the individual assessment area sections.

Assessment Area Concentration

The bank extended a majority of its loans inside its assessment areas. The following table shows the bank's concentrations of lending inside and outside the assessment areas from January 1, 2016, to December 31, 2017.

Lending Inside and Outside the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Equity	3,360	93.5	303,767	91.6	235	6.5	27,788	8.4
Motor Vehicle	11,465	49.8	265,804	47.4	11,544	50.2	294,498	52.6
Other – Secured	8,154	68.5	157,886	64.0	3,759	31.6	88,795	36.0
Other – Unsecured	3,821	92.3	36,532	85.4	317	7.7	6,225	14.6
Other Loan Data	1	100.0	5	100.0	0	0.0	0	0.0
Total Consumer-Related	26,801	62.8	763,994	64.7	15,855	37.2	417,306	35.3
Home Improvement	1,022	94.6	78,131	92.0	58	5.4	6,765	8.0
Home Purchase – Conventional	4,363	91.8	928,718	91.9	390	8.2	81,647	8.1
Home Purchase – FHA	1,109	92.2	211,685	93.1	94	7.8	15,800	7.0
Home Purchase – VA	582	92.7	153,623	94.0	46	7.3	9,758	6.0
Multi-Family Housing	72	94.7	41,977	94.3	4	5.3	2,563	5.8
Refinancing	2,573	93.5	530,041	93.4	180	6.5	37,318	6.6
Total HMDA-Related	9,721	92.6	1,944,175	92.7	772	7.4	153,851	7.3
Small Business Secured by Real Estate	347	92.8	47,737	91.6	27	7.2	4,373	8.4
Small Business	7,739	87.0	667,407	91.4	1,161	13.0	62,931	8.6
Total Small Business-Related	8,086	87.2	715,144	91.4	1,188	12.8	67,304	8.6
Total Small Farm-Related	1,995	78.9	139,789	80.3	534	21.1	34,270	19.7
TOTAL LOANS	46,603	71.7	3,563,102	84.1	18,349	28.3	672,731	15.9

The bank extended 71.7% of all loans by number and 84.1% by dollar amount within its assessment areas. The levels vary by product type but overall are consistent with the levels during the previous evaluation period. The bank's highest concentration of lending within its assessment areas is for HMDA loans, which are the predominant products based on loan dollars and received the most weight. The level of consumer lending within the assessment areas is similar for other loan types except for motor vehicle loans. This category is much lower than others because the bank expanded its indirect buy program to three more states. A large percentage of motor vehicle loans were made in Idaho, Oregon, and Washington in 2017. The bank also continues to purchase automobile loans from area dealerships, which attract customers from other areas. Finally, many of the bank's loans made outside its assessment areas are in neighboring counties. This is reasonable given the bank's large footprint, particularly in Montana and Wyoming.

Borrower and Geographic Distributions

The bank's distribution of loans among low- and moderate-income borrowers and among businesses and farms of different sizes is excellent. The bank actively originates HMDA loans to low- and moderate-income borrowers. It also actively lends to farms and businesses of different sizes in its assessment areas. The bank's overall consumer lending to low- and moderate-income borrowers is good.

The bank's geographic distribution of loans in low- and moderate-income census tracts is good. The bank's lending patterns do not reveal any unexplained gaps in any of the assessment areas.

Innovative and Flexible Lending Practices

The bank makes extensive use of innovative and/or flexible lending programs. The bank continues to participate in a variety of programs to meet the credit needs of low- and moderate-income individuals, businesses, and farms. The bank is particularly active in housing programs for low- and moderate-income homebuyers and uses a combination of programs, if appropriate. The following list highlights a number of the programs the bank participated in during the evaluation period:

- *Montana Board of Housing.* MBOH helps make home ownership affordable for first-time homebuyers by offering low-interest-rate mortgages and down payment assistance. MBOH loans must be insured or guaranteed by FHA, RD, VA, or HUD (Section 184 program). Eligible borrowers have to meet income limits MBOH has established.
- *Wyoming Community Development Authority.* WCDA provides mortgages at below-market interest rates for first-time homebuyers. It also offers second mortgages that provide a portion of the down payment and closing costs. The standard homebuyer program is for individuals whose income is at or below the program's income limits and who are purchasing a home within the state. Eligible borrowers have to meet income limits WCDA has established.
- *South Dakota Housing Development Authority.* SDHDA offers a variety of programs that assist low- and moderate-income borrowers in South Dakota. SDHDA offers low-interest-rate mortgages, closing cost and down payment assistance, and home improvement loans. Eligible borrowers must meet income limits SDHDA has established.
- *Home\$tart Savings Program.* The Home\$tart program helps first-time homebuyers earning up to 80.0% of their area's median family income purchase a home. These grants may be used for down payment and closing cost assistance for eligible homebuyers.
- *NeighborWorks Montana.* This program provides down payment and closing cost assistance for borrowers who meet the program's income limits.
- *Jackson Hole Community Housing Trust and Teton County Housing Authority.* These housing organizations have created affordable housing programs that meet Fannie Mae guidelines. The bank is the only local lender that has been approved as the Fannie Mae underwriter, according to the bank.
- *HomeReady.* This Fannie Mae program offers flexibility in underwriting and down payment requirements for qualified borrowers who meet specific income criteria or properties that meet geographic location criteria.
- *HomeNow.* This program is available through MoFi for Montana residents and offers non-repayable grants, as well as a zero percent interest on deferred loans for assistance with down payment and closing costs. The program is not limited to first-time homebuyers and is geared toward low-, moderate-, and middle-income borrowers.
- *District XI Human Resource Council, Inc. (HRC).* The HRC serves Mineral, Missoula, and Ravalli counties in Montana. The HRC helps eligible low-income individuals and families with supplemental gas, electric, or water bill assistance, immediate energy emergencies, weatherization, Section 8 rental assistance, emergency rental assistance for individuals who are homeless or facing eviction, employment and training for youth and adults, interim assistance for

those who are permanently or temporarily disabled, and first-time homebuyer down payment assistance. The HRC also provides information and referral services through telephone number 211 (a comprehensive telephone information and referral source).

- *City of Billings First-Time Home Buyer Program.* Billings offers a loan program that provides financial assistance to low-income households to assist them in qualifying for traditional housing financing programs to purchase their first home. The program is designed to close an affordability gap for many low-income households currently unable to purchase their first home without assistance. Funding for this program is provided by HUD through the HOME Investment Partnerships program and the Community Development Block Grant program. The funding sources have different requirements.
- *First Care Credit.* The bank partners with local hospitals and clinics in the Billings, Missoula, Sheridan, and Rapid City assessment areas. Patients who are not able to pay medical bills in full around the time of service benefit from this program, including those without health insurance or with limited coverage. These loans are unsecured, with favorable interest rates, and the bank does not pull a credit report.
- *Wyoming Technology Access Program.* The bank’s Laramie branch partners with Wyoming Independent Living Rehabilitation, Inc., for this financing program. The bank offers Wyoming residents with disabilities reduced-interest loans to purchase assistive technology equipment and services that generally would otherwise be unaffordable.
- *Energy West No-Interest Loan Program.* The bank partners with utility company Energy West, Inc., in its Great Falls assessment area. Energy West customers (residential or commercial) can obtain an interest-free loan to finance energy conservation measures or improvements.
- *Small Business Administration.* SBA loans, which include SBA 7(a), 504, and Express loans, have flexible underwriting criteria for small businesses and are often extended to businesses that cannot qualify for conventional financing.
- *Farm Service Agency.* FSA loans have flexible underwriting criteria and are often extended to farmers who cannot qualify for conventional financing.
- *Junior Livestock Program.* The Junior Livestock Program is a program offered in the Laramie market. This program finances livestock purchases for 4-H and Future Farmers of America students who are unable to fund the project up front. While the student’s parent or guardian is on the note, the bank does not consider their credit history or ability to repay. The loan is repaid by the sale of the livestock.

Community Development Lending

The bank is a leader in making community development loans. The bank originated 58 community development loans totaling \$81.0 million during the evaluation period that benefit its assessment areas or larger regional areas that also include its assessment areas. By number of loans, the bank extended 15.5%, 13.8%, and 12.1% of its community development loans in the Laramie, Billings, and Missoula assessment areas, respectively. By dollar amount of loans, the bank’s community development lending was highest in the Missoula assessment area (29.0%) and approximately 12.0% in each of the following assessment areas: Billings, Great Falls, and Kalispell.

Community Development Loans by Assessment Area or Regional Area		
<i>Assessment Area</i>	#	\$
Billings MSA	8	9,726,246
Great Falls MSA	4	9,505,000
Missoula MSA	7	23,492,032
Bozeman	1	1,138,976
Hamilton	2	2,533,750

Community Development Loans by Assessment Area or Regional Area		
<i>Assessment Area</i>	#	\$
Hardin/Miles City	3	474,094
Helena	1	80,000
Kalispell	2	10,015,150
Absarokee/Columbus	0	0
Cut Bank	0	0
Ennis	0	0
Casper MSA	4	5,893,387
Cheyenne MSA	2	518,882
Jackson	1	150,000
Laramie	9	8,698,242
Riverton	3	3,660,000
Sheridan	5	1,308,996
Rapid City MSA	2	269,184
Belle Fourche	2	723,238
Edgemont	0	0
Sioux Falls MSA (2016 only)	0	0
Regional Montana	2	2,762,000
Total	58	80,949,177

The bank did not make any community development loans in five assessment areas. Several factors contribute to this performance. Community development opportunities are reasonably available in some areas but are limited in others. For two assessment areas, the bank acquired branches in August 2016, which limited the bank’s ability to make community development loans. In other assessment areas, the bank has a smaller market presence and competes with larger financial institutions for these types of loans. Relative to available opportunities, the bank originated an excellent level of community development loans.

Because the bank was responsive in meeting the credit and community development needs of its assessment areas, examiners also considered two community development loans totaling \$1.6 million that benefited areas outside of the bank’s assessment areas, one in Montana and one in Wyoming.

INVESTMENT TEST

The Investment Test rating is high satisfactory. The overall level of qualified investments in the form of securities and donations is significant. During the evaluation period, qualified investments in the form of securities and donations benefiting the bank’s assessment areas or larger regional areas including the assessment areas totaled \$74.1 million. This figure includes \$72.7 million in securities and \$1.4 million in donations. Qualified investments in the form of securities include \$58.5 million in prior-period investments and \$14.2 million in new investments. Many of these investments were bonds, Low-Income Housing Tax Credit (LIHTC) projects, or CRA-targeted mortgage-backed securities (MBS). The bank also invested in one new LIHTC and one New Markets Tax Credit (NMTC) project, which demonstrated excellent responsiveness to credit and community development needs. These types of projects are highly complex investments. The bank continues to make significant use of innovative and/or complex investments when opportunities exist. The following table shows the list of qualified investments in the form of securities by assessment area and regional or statewide area. Overall, the level of investments shows good responsiveness to the credit needs and community development needs of the assessment areas.

Qualified Investment Securities by Assessment Area or Regional/Statewide Area		
<i>Assessment Area</i>	<i>Securities</i>	
	#	\$
Billings MSA	5	11,040,188
Great Falls MSA	2	1,432,927
Missoula MSA	6	8,885,578
Bozeman	5	5,392,757
Hamilton	3	1,280,000
Hardin/Miles City	6	4,913,421
Helena	0	0
Kalispell	7	3,239,283
Absarokee/Columbus	0	0
Cut Bank	1	2,293,200
Ennis	0	0
Casper MSA	0	0
Cheyenne MSA	2	1,219,992
Jackson	8	3,874,875
Laramie	0	0
Riverton	3	105,000
Sheridan	3	110,000
Rapid City MSA	6	2,495,000
Belle Fourche	1	310,000
Edgemont	1	400,000
Sioux Falls MSA (2016 only)	0	0
Statewide Montana (includes MBS)	25	4,051,329
Statewide Wyoming	0	0
Statewide South Dakota	7	2,800,405
Montana and Wyoming	33	9,913,523
Montana and South Dakota	7	1,800,103
Montana, Wyoming, and South Dakota	13	7,119,065
Total	144	72,676,646⁸

Since the bank was responsive to the community development needs of its assessment areas, examiners also considered qualified investments in the form of securities that benefited areas outside of the bank's assessment areas, which totaled \$8.3 million.

Donations. The bank and the foundation made a significant level of qualified investments in the form of donations that directly benefited the bank's assessment areas or larger statewide/regional areas that include the bank's assessment areas. These donations totaled \$1.4 million, as shown in the tables below. The foundation donates money through the employee gift match, employee volunteer match, and foundation grant programs.

⁸ This figure includes investments/securities that matured, were sold, or paid during the evaluation period.

Qualified Investments in the Form of Donations Benefiting Assessment Areas		
<i>First Interstate Bank</i>	#	\$
Affordable Housing	36	72,983
Community Services	431	593,681
Economic Development	14	19,499
Revitalize or Stabilize	11	30,265
Revitalize or Stabilize Distressed or Underserved areas	8	8,100
Total	500	724,528
<i>Foundation</i>	#	\$
Affordable Housing	53	30,933
Community Services	890	569,778
Economic Development	4	4,200
Revitalize or Stabilize	9	37,650
Revitalize or Stabilize Distressed or Underserved areas	1	3,000
Total	957	645,561

Qualified Investments in the Form of Donations Benefiting Regional and Statewide Areas		
<i>First Interstate Bank</i>	#	\$
Affordable Housing	1	2,500
Community Services	9	5,303
Total	10	7,803
<i>Foundation</i>	#	\$
Affordable Housing	2	1,495
Community Services	10	12,453
Economic Development	1	15,000
Total	13	28,948

The donations show excellent responsiveness to community development needs. Additional details are presented in the analysis of each state and full-scope assessment area.

SERVICE TEST

The bank’s Service Test rating is high satisfactory. Delivery systems are readily accessible to low- and moderate-income individuals and geographies in the bank’s assessment areas. Branch closures have not adversely affected the accessibility of the bank’s delivery systems. Services do not vary in a way that inconveniences low- or moderate-income areas or individuals throughout the assessment areas. The bank provides a relatively high level of community development services.

Retail Banking Services

Delivery systems generally are readily accessible throughout the bank’s assessment areas, and services do not vary in a way that inconveniences low- or moderate-income areas or individuals. Tables illustrating

the branches and ATMs by tract location can be found in the state sections and the full-scope assessment area sections.

The bank provided retail services through its network of 81 offices, which included numerous drive-up facilities, as well as numerous ATMs. Of the 81 offices, 22.2% are located in low- and moderate-income tracts, 61.7% are in middle-income tracts, and 16.1% are in upper-income tracts. The bank acquired some new offices and ATMs through acquisitions and also closed a few branches, limited-service and drive-up facilities, and ATMs. Overall, the closings did not adversely affect the accessibility of the bank’s delivery systems. Hours of operation remain reasonable. Many branches and drive-up facilities have extended and/or Saturday hours to accommodate residents in the assessment areas. The bank partners with third-party operators to offer surcharge-free, cash-dispensing-only ATMs in various assessment areas. Refer to the Assessment Area Information table earlier in this section, the Retail Banking Services in the state sections, or the relevant individual assessment area sections for additional information on retail banking structure changes.

The bank also provides alternative delivery systems that include remote deposit capture, telephone banking, online banking, and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, make loan and other bill payments, open deposit accounts, and apply for some consumer loan products. The bank offers standardized products and services throughout its assessment areas; however, some differences relate to special loan programs administered by city or state housing agencies.

Finally, the bank waives a few escrow fees for some home mortgage loans it services for affordable housing organizations. It also waives some deposit account service fees for some nonprofit organizations that primarily serve low- and moderate-income individuals. These fee waivers occur in some Montana and Wyoming assessment areas.

Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its assessment areas. This conclusion primarily reflects the bank’s performance in the full-scope assessment areas. The two tables in this section provide information on community development services that show direct focus on the bank’s assessment areas (268) as well as community development services with a regional, statewide, or multistate focus that include the bank’s assessment areas (33).

Community Development Services Benefiting Assessment Areas	
<i>Purpose</i>	#
Affordable Housing	38
Community Services	195
Economic Development	20
Revitalize or Stabilize	15
Total	268

Bank officers and employees provided assistance to many nonprofit organizations that help low- and moderate-income individuals; economic development organizations that support growth, job creation, and small businesses; organizations and community efforts that helped to revitalize and stabilize local areas; and organizations that promote affordable housing. Employees held a variety of leadership positions, such as serving as board members and finance or loan committee members. In addition, employees presented about financial literacy to youth and adults. Many employees also served in more than one role for the organization or served for multiple years. The state and full-scope assessment area sections include more details about the bank’s Service Test performance.

Community Development Services with a Regional, Statewide, or Multistate Benefit	
<i>Purpose</i>	#
Affordable Housing	8
Community Services	20
Economic Development	5
Total	33

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of discriminatory or other illegal credit practices inconsistent with the bank helping to meet community credit needs. As of the date of this report, the Federal Reserve is unaware of any violations of the Equal Credit Opportunity Act, Regulation B, or Unfair, Deceptive, or Abusive Acts or Practices identified by the Consumer Financial Protection Bureau. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.

MONTANA

CRA RATING FOR Montana: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Montana assessment areas shows excellent responsiveness to local credit needs.
- The lending to farms and businesses of different sizes and to low- and moderate-income borrowers is excellent.
- The distribution of small farm, small business, HMDA, and consumer loans throughout the assessment areas is good.
- The bank is a leader in making community development loans in its Montana assessment areas.
- The bank makes extensive use of flexible loan programs in its Montana branches.
- The bank has an excellent level of qualified investments by number and dollar amount, which exhibits excellent responsiveness to credit and community development needs.
- Bank retail services are readily accessible to farms, businesses, and residents throughout the assessment areas, and the bank provides a relatively high level of community development services in its Montana assessment areas.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Montana is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Billings MSA and the Kalispell assessment areas. Examiners weighted the Billings MSA assessment area greater than the Kalispell assessment area based on the bank's lending volume in those assessment areas.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Great Falls MSA, Missoula MSA, Bozeman, Hamilton, Hardin, Helena, Absarokee/Columbus, Cut Bank, and Ennis assessment areas in Montana. Examiners evaluated whether the bank's performance in the limited scope assessment areas was consistent with its performance in the full-scope assessment areas. The limited-scope MSA assessment areas were compared against metropolitan full-scope assessment areas. Similarly, nonmetropolitan limited-scope assessment areas were compared to nonmetropolitan full-scope assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MONTANA

Assessment Area Information. During the evaluation period, the bank had 11 assessment areas in Montana. Since the previous evaluation, the bank added the Cut Bank and Ennis assessment areas because of a bank acquisition in 2016.

According to the June 30, 2017, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank has \$4.1 billion in deposits in its Montana assessment areas, which is 56.2% of total

bank deposits. According to the same report, the bank ranks 1st among the 59 FDIC-insured institutions in Montana, with 17.8% of the state's deposits. The bank operates in highly competitive assessment areas with many regional and several national banks. Two of the larger regional banks hold 16.5% and 10.5% of the state's deposits, respectively. Two large national banks hold 12.7% and 10.1% of the of the state's deposits, respectively. The bank and the four other largest deposit holders account for 67.6% of the deposits in the state.

Based on 2017 FFIEC adjusted census data, the Montana assessment areas include 187 census tracts: 4 low-, 35 moderate-, 113 middle-, and 35 upper-income census tracts.⁹ Of the nonmetropolitan middle-income census tracts, 11 are classified as distressed, 12 are classified as underserved, and two are classified as both distressed and underserved.

Some of the Montana assessment areas include American Indian reservations. Portions of the Crow River Indian Reservation are located in the Billings MSA and the Hardin assessment areas. The Northern Cheyenne Reservation is also located in the Hardin assessment area. Portions of the Flathead Indian Reservations are located in the Kalispell and Missoula MSA assessment areas. The Blackfeet Indian Reservation is in the Cut Bank assessment area.

Population. According to 2017 FFIEC adjusted census data, the total population of the assessment areas in Montana is 782,914, which is 77.2% of the state's population of 1,014,699.

General Economic and Housing Information. Bank management and community contacts stated that economic conditions in Montana were stable and experienced some growth during the evaluation period. The state's not seasonally adjusted unemployment rate was 4.1% in 2016 and 3.9% in 2017, which was lower than the national unemployment rate for 2016 and 2017, respectively.

Agriculture is one of the largest industries in Montana and a predominant economic driver in many of the bank's assessment areas. According to the 2017 Census of Agriculture, 27,048 farms operated in the state. Montana produces small grains; wheat, including winter wheat and spring wheat; barley; and hay, including alfalfa hay and wild hay. In addition, a lot of ranchers in Montana produce livestock; there are many cattle ranches throughout the state.

Small businesses also play a significant role in Montana's diverse economy. According to the SBA's 2018 Small Business Profile, Montana small businesses employ 65.2% of the private workforce in the state, as of 2015. Most of those small businesses have fewer than 100 employees. Construction, retail, government, health care, and technical services are among the primary nonagricultural industries, as well as recreation and tourism.

The housing market in Montana is mixed. Housing is generally available; however, the limited availability of affordable housing, including single-family homes, is an issue across the entire state. In general, housing prices continue to increase at a faster pace than wages. These factors make homeownership difficult for some people.

According to 2017 FFIEC census estimates, the median housing value for the state of Montana was \$193,500, with the lowest value in Big Horn at \$88,500 and the highest value in Missoula County at \$239,700. The median age of housing stock in the state was 39 years old, with the lowest median age of housing stock in Gallatin County at 23 years old and the largest median age of housing stock at 54 years in Golden Valley County.

⁹ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

Montana has numerous financial institutions. Many large national and regional banks, as well as credit unions, operate throughout the state. Accordingly, competition for deposits, loans, and community development activities is strong in various assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MONTANA

Examiners based the Montana evaluation on full-scope reviews of the Billings MSA and Kalispell assessment areas and limited-scope reviews of the remaining Montana assessment areas. A detailed discussion of the bank’s performance in the full-scope assessment areas and a shorter discussion of the limited-review assessment areas follow this section. For the limited-scope assessment areas, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Montana is outstanding based on the bank’s performance under the Lending, Investment, and Service tests.

The Lending Test rating is outstanding. The bank’s lending activity reflects excellent responsiveness to credit needs throughout the Montana assessment areas. The bank’s distribution of loans to borrowers of different income levels and to businesses and farms of different sizes is also excellent. The geographic distribution of loans reflects good penetration throughout the assessment areas. The bank is a leader in making community development loans. Finally, the bank uses flexible loan programs extensively in certain assessment areas.

The Investment Test rating is outstanding. The bank made an excellent level of qualified investments by number and dollar amount, which showed excellent responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. The bank’s delivery systems are readily accessible to all portions of the Montana assessment areas. The bank made some changes to branch and ATM locations during the evaluation period; however, these changes did not adversely affect the availability of its delivery systems. The bank provides a relatively high level of community development services.

LENDING TEST

The Lending Test rating is outstanding for Montana.

Lending Activity

The bank’s lending levels reflect excellent responsiveness to credit needs in its Montana assessment areas. The following table shows the bank’s lending in its Montana assessment areas by product type for the two-year evaluation period.

Summary of Lending Activity in the Montana Assessment Areas				
<i>Loan Type</i>	<i>2016</i>			
	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
HMDA Home Purchase	1,639	57.3	353,462	62.5
HMDA Refinancing	882	30.9	179,814	31.8
HMDA Home Improvement	324	11.3	20,663	3.7
HMDA Multifamily	13	0.5	11,521	2.0
Total HMDA Related	2,858	21.9	565,460	55.7
Total Small Business Related	2,330	17.8	212,591	20.9
Total Small Farm	361	2.8	25,012	2.5

Summary of Lending Activity in the Montana Assessment Areas				
<i>Loan Type</i>	<i>2016</i>			
	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
Home Equity	1,009	13.4	90,101	42.5
Motor Vehicle	2,928	39.0	66,305	31.2
Other – Secured	2,399	31.9	44,558	21.0
Other - Unsecured	1,178	15.7	11,228	5.3
Total Consumer Related	7,514	57.5	212,192	20.9
Total Loans	13,063	100.0	1,015,255	100.0
	<i>2017</i>			
HMDA Home Purchase	1,364	62.3	303,104	70.5
HMDA Refinancing	473	21.6	90,973	21.1
HMDA Home Improvement	318	14.5	18,710	4.3
HMDA Multifamily	33	1.5	17,445	4.1
Total HMDA Related	2,188	20.1	430,232	50.7
Total Small Business	2,074	19.0	206,348	24.3
Total Small Farm	442	4.1	36,364	4.4
Home Equity	921	14.8	80,700	46.0
Motor Vehicle	2,014	32.4	43,039	24.5
Other - Secured	2,053	33.1	41,366	23.6
Other - Unsecured	1,220	19.7	10,278	5.9
Total Consumer Related	6,208	57.3	175,383	21.0
Total Loans	10,912	100.0	848,327	100.0
	<i>2016 – 2017</i>			
GRAND TOTALS	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
Total HMDA	5,046	21.0	995,692	53.4
Total Small Business	4,404	18.4	418,939	22.5
Total Small Farm	803	3.3	61,376	3.3
Total Consumer	13,722	57.2	387,575	20.8
Total All Loans	23,975	100.0	1,863,582	100.0

The Montana assessment areas contain the majority of the bank’s lending activity. Specifically, the bank’s Montana lending accounted for 51.5% of the bank’s originations during the evaluation period.

The bank is usually among the leading lenders for HMDA, small business, and small farm loans in the areas it serves. During each year of the evaluation, the bank was typically in the top five lenders for all three loan types.

The bank uses flexible and/or innovative lending programs, particularly home mortgage loans, for low- and moderate-income borrowers. In addition to participating in many third-party special loan programs, the bank offers a flexible consumer loan program in the Billings MSA assessment area. Refer to the Innovative and Flexible Lending Practices in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank’s distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to low- and moderate-income borrowers and to small farms and small businesses throughout the assessment areas. In addition, the geographic

distribution of loans is good. The bank extends loans throughout its assessment areas, including the low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Billings MSA assessment area and the Kalispell assessment area. The tables in Appendix D show the borrower and geographic distributions of the bank’s loans, demographic characteristics, and aggregate lending data for the limited-scope assessment areas.

Community Development Loans

The bank is a leader in making community development loans in the Montana assessment areas. The bank’s community development lending was concentrated in certain assessment areas. By number of loans, it extended 26.7% and 23.3% of its community development loans in the Billings MSA and Missoula MSA assessment areas. By dollar amount of loans, 39.3% of the bank’s community development lending was in the Missoula MSA and 16.3% in the Billings MSA, 15.9% in the Great Falls MSA, and 16.8% in the Kalispell assessment areas. The bank did not originate any community development loans in the Absarokee/Columbus, Cut Bank, or Ennis assessment areas.

Montana Community Development Loans		
<i>Purpose</i>	#	\$
Affordable Housing	12	17,735,875
Community Services	4	2,857,150
Economic Development	7	16,422,152
Revitalize and Stabilize	7	22,714,071
Total	30	59,727,248

Community development lending was responsive to the needs of the assessment areas. The majority of the bank’s lending supported efforts to provide affordable housing to low- and moderate-income individuals. There is a critical need for affordable housing for lower-income residents across the state of Montana. The bank originated loans to purchase, construct, refinance, or rehabilitate affordable housing projects in the Billings MSA, Great Falls MSA, Missoula MSA, Hamilton, and Hardin/Miles City assessment areas. The bank’s community development lending also supported economic development efforts by helping businesses, including tribal entities, create and retain jobs. The bank made significant loans to help revitalize and stabilize low- and moderate-income, distressed, or underserved areas in several assessment areas. The bank’s community service purpose loans supported community development efforts in regional Montana that includes that bank’s assessment areas.

Because the bank’s community development lending activities adequately addressed community development needs in its Montana assessment areas, examiners were able to consider any qualified community development loans benefiting geographies outside the bank’s assessment areas. The bank originated one loan outside its Montana assessment areas totaling \$835,000, which is not included in the table above. The loan supported an affordable housing project in a small town in eastern Montana.

INVESTMENT TEST

The bank’s Investment Test rating is outstanding for Montana. Overall, the bank has an excellent level of qualified investments in the form of securities and donations, which shows excellent responsiveness to credit and community development needs.

The bank made an excellent level of qualified investments in the form of securities during the evaluation period. During the evaluation period, the bank held 35 qualified investments totaling \$38.5 million that directly benefited its Montana assessment areas. These investments included \$10.5 million in new bonds and securities and \$28.0 million in prior-period investments. New investments include over \$8.2 million in affordable housing investments in the Billings MSA and Missoula MSA assessment areas. The bank made a large investment, \$7.3 million, in an affordable housing multifamily rental property in Billings in

which 100% of the units are dedicated to low- and moderate-income residents. In addition, the bank made a significant investment of \$2.3 million in a project that promotes economic development in the Cut Bank assessment area. This investment is a NMTC that will benefit the Blackfeet Indian Reservation by funding the construction of a new building at the local community college.

The bank’s prior-period investments benefited multiple assessment areas. The largest of these investments were for affordable housing projects in the bank’s Missoula MSA. The bank also held other affordable housing investments, economic development investments, community service investments, and investments that help with revitalization and stabilization efforts. The bank also continued to hold 18 mortgage backed securities in the amount of \$3.6 million, as well as seven securities for \$450,000 that supported affordable housing and economic development; these prior-period investments benefitted the state of Montana.

Because the bank’s investment activities adequately addressed community development needs in its Montana assessment areas, examiners were also able to consider the bank’s qualified Montana investments that are outside the bank’s assessment areas. The bank held 14 qualified investments totaling \$6.0 million that benefit areas of Montana outside of its assessment areas. Three of these investments are new and total \$242,500: one bond funds improvements for a school located in an underserved area; the other two investments supported an affordable housing project.

Donations. The bank made a significant level of donations during the evaluation period. The bank made \$914,179 in donations that directly benefit its assessment areas, \$35,963 in donations that benefit the state of Montana, and \$185 in donations that benefit regional Montana including the bank’s assessment areas. The Montana Qualified Investment Donations table shows the distribution of the donations by assessment area, regional Montana, and state of Montana.

Montana Qualified Investment Donations						
<i>Assessment Area</i>	<i>Bank</i>		<i>Foundation</i>		<i>Total</i>	
	<i>#</i>	<i>\$</i>	<i>#</i>	<i>\$</i>	<i>#</i>	<i>\$</i>
Billings MSA	110	216,563	290	220,154	400	436,717
Missoula MSA	35	43,650	56	31,760	91	75,410
Great Falls MSA	26	62,575	62	23,503	88	86,078
Kalispell	13	9,380	44	12,606	57	21,986
Bozeman	34	30,113	88	28,451	122	58,564
Hamilton	1	1,000	0	0	1	1,000
Hardin	53	26,623	27	126,000	80	152,623
Helena	50	42,595	39	23,141	89	65,736
Absarokee	3	8,000	6	2,150	9	10,150
Ennis	2	2,500	2	3,230	4	5,730
Cut Bank	0	0	0	0	0	0
Regional Montana	0	0	2	185	2	185
State of Montana	8	7,700	10	28,263	18	35,963
Total	335	450,699	626	499,443	961	950,142

The bank’s donations supported numerous organizations throughout its Montana assessment areas. By dollar amount, 88.1% of the donations in the bank’s assessment areas were made to organizations that provide community services to low- and moderate-income individuals. The bank also supported economic development, affordable housing initiatives, and efforts to revitalize and stabilize underserved and distressed areas as well as low- and moderate-income areas. The bank supported food shelves, community centers, regional economic development corporations, transitional housing providers, health centers, and schools, among many others.

The bank made the most donations by dollar amount in the Billings MSA assessment area, followed by the Hardin and Great Falls assessment areas. The bank made a notable donation in the Hardin assessment area for approximately \$75,000 to an emergency nutrition and food center that provides services to low- and moderate-income families and children. Other notable donations included support for youth-focused organizations, affordable housing efforts, and revitalization and stabilization efforts on an American Indian reservation. The bank also made in-kind donations, including the usage of meeting space, in its assessment areas. The bank’s donations were responsive to the needs of the Hardin/Miles City assessment area, which is predominantly classified as distressed and/or underserved. The bank also made qualified donations at the statewide level supporting community service, affordable housing, and economic development.

SERVICE TEST

The Service Test rating is high satisfactory for Montana. Delivery systems are readily accessible to all portions of the Montana assessment areas. The bank’s retail distribution channels changed since the previous evaluation. The bank closed four branches with ATMs, one drive-up facility, and two ATMs—one deposit-taking and one cash-dispensing-only. In addition, the bank acquired six branches with ATMs and relocated one branch with an ATM. The branch hours and retail services are reasonable and do not vary in a way that would inconvenience certain individuals or areas. Finally, the bank provides a relatively high level of community development services, which are responsive to community development needs in its assessment areas.

Retail Banking Services

The bank’s delivery systems are readily accessible to all portions of the Montana assessment areas, and services do not vary in a way that inconvenience low- and moderate-income areas or individuals. The bank operates its main office, branches, and ATMs in its 11 Montana assessment areas.

Geographic Distribution of Branches & ATMS

State of Montana

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	2	4.3%	0	0	1	1	0	Total	4	6.3%	2	6.7%	0	0	2	5.9%	0	0	4	2.1%	1.7%	2.5%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Moderate	11	23.4%	0	0	11	10	6	Total	18	28.1%	10	33.3%	0	0	8	23.5%	0	0	35	18.7%	17.7%	18.5%
DTO	0		0	0				SA	6		3		0	0	3		0	0				
Middle	27	57.5%	7	3	20	17	9	Total	36	56.3%	16	53.3%	5	2	20	58.8%	3	1	113	60.4%	59.2%	57.9%
DTO	3		0	0				SA	7		2		0	0	5		0	0				
Upper	7	14.9%	0	3	6	5	2	Total	6	9.4%	2	6.7%	0	0	4	11.8%	0	4	35	18.7%	21.4%	21.1%
DTO	0		0	1				SA	0		0		0	0	0		0	1				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	47	100.0%	7	6	38	33	17	Total	64	100.0%	30	100.0%	5	2	34	100.0%	3	5	187	100.0%	100.0%	100.0%
DTO	3		0	1				SA	14		5		0	0	9		0	1				

2017 FFIEC Census Data, 2017 D&B Inf(and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

The branches are accessible to all portions of its assessment areas. As of 2017, the bank has 4.3% and 23.4% of its branches in low- and moderate-income census tracts, respectively. These percentages compare well to demographics, given that low- and moderate-income census tracts represent 2.1% and 18.7%, respectively, of the census tracts in the Montana assessment areas.

The bank acquired six branches from another bank in 2016. Four of the acquired branches were in the bank’s existing assessment areas. Because two branches (Cut Bank and Ennis) were outside existing assessment areas, the bank needed to add two new assessment areas. The bank kept the acquired branches located in Lakeside, Cut Bank, Ennis, Big Fork, and two branches in Belgrade. The bank closed two existing branches: one in Belgrade and one in Big Fork. After these closures, FIB also closed existing branches in Missoula and Helena. All branches had ATMs, and all branch closures occurred in middle- or upper-income census tracts. The bank closed one stand-alone, cash-dispensing-only ATM and one drive-up facility – both in upper-income census tracts – as well as a deposit-taking ATM that was located in a moderate-income census tract. Overall, the branch, drive-up, and ATM closures did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals or geographies.

The bank offers the same products and services at each of its Montana locations. Many branches have weekend and extended hours, and the majority of branches have drive-up facilities. Hours of operation at each branch are reasonable and do not vary in a way that inconveniences individuals or areas. In addition to branches and ATMs, the bank offers telephone, online, and mobile banking services. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts, and apply for certain consumer loans. The bank also partners with third-party operators to provide 22 additional surcharge-free cash-dispensing-only ATMs to its customers in the Montana assessment areas.

Finally, the bank waives certain fees, such as fees for some home mortgage loans and service charges on deposit accounts, for accounts serviced for or held by some nonprofit organizations that primarily serve low- and moderate-income individuals in the Billings MSA and Missoula MSA assessment areas.

Community Development Services

The bank provides a relatively high level of community development services in the Montana assessment areas. This rating primarily reflects the bank’s performance in the full-scope assessment areas but also recognizes the level of services in the other Montana assessment areas. The bank provided 25.0% and 23.9% of its community development services in the Billings MSA and Hardin assessment areas, respectively. The table below shows the distribution of community development services by type of activity and assessment area.

Montana Community Development Services					
<i>Assessment Area</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Revitalize and Stabilize</i>	<i>Total</i>
Billings MSA	7	30	0	1	38
Missoula MSA	3	1	0	1	5
Great Falls MSA	2	18	5	0	25
Kalispell	0	12	5	0	17
Hamilton	0	0	1	1	2
Bozeman	0	2	1	0	3
Hardin	5	20	3	9	37
Helena	2	14	0	0	16
Absarokee	0	0	0	0	0
Ennis	0	0	0	0	0
Cut Bank	0	0	0	0	0
State of Montana	2	10	0	0	12
Totals	21	107	15	12	155

Numerous bank employees provided their financial expertise and time to organizations that support community development initiatives in Montana. During the evaluation period, bank employees provided services to organizations involved in economic development, community service, and affordable housing. In addition, employees provided their talents to organizations that help revitalize and stabilize low- and moderate-income, underserved, and distressed areas of Montana. The majority of services (70.3%) were conducted with community service organizations that provide educational, social, and other services. Employees often held leadership positions within these organizations, including serving on the board of directors or finance committees. The bank engaged in community development services in the majority of its Montana assessment areas, and it also provided several services that benefit the state of Montana. The bank did not provide services in three assessment areas. This is reasonable, however, since those assessment areas are rural and have fewer branches and employees; in addition, the Cut Bank and Ennis assessment areas were new as of mid-2016.

Many bank employees taught financial skills, such as the importance of saving and budgeting, to low- and moderate-income individuals, including children. These services were highly responsive to the needs of the areas the bank serves and provide young people with a solid understanding of finances, which is important for future success. Bank employees also served organizations that provide a variety of community services to low- and moderate-income residents, including families and at-risk youth, throughout the state. Based on 2017 FFIEC adjusted census data, 23.8% and 16.6% of households in the Montana assessment areas are low- and moderate-income, respectively; 14.5% of households are below poverty level.

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BILLINGS, MONTANA, MSA 13740 ASSESSMENT AREA

Bank Information. The bank operates eight full-service branches in the Billings MSA. All branches have lobby and drive-up facilities. The bank operates seven cash-dispensing-only ATMs and nine deposit-taking ATMs. By number, the bank has 9.9% of its branches in this assessment area. See the Retail Services Test section for more details.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank ranks 1st among 12 financial institutions operating in the Billings MSA, with a 25.7% deposit market share and \$1.2 billion in deposits. The deposits in this assessment area represent 16.9% of the bank's overall deposits. The bank faces competition from several local community banks, regional banks, large national banks, and credit unions.

Assessment Area Information. The Billings MSA assessment area is in south-central Montana and consists of Yellowstone, Carbon, and Golden Valley counties, which form the Billings MSA. The Billings MSA includes rural and urban areas. A small portion of the Crow Indian Reservation lies in Yellowstone County. The majority of the reservation is located in Big Horn County, which is part of the bank's Hardin/Miles City assessment area. Billings is the largest city and the economic hub in the assessment area.

The bank has not changed this assessment area since the previous evaluation; however, the income classifications for some income census tracts changed based on 2017 FFIEC adjusted census data. In 2016, the Billings MSA assessment area included 1 low-, 5 moderate-, 26 middle-income, and 6 upper-income census tracts. The income classifications for some tracts changed in 2017. The Combined Demographics Report on the following page provides demographic information for this assessment area, based on 2017 FFIEC adjusted census data and 2017 D&B data.¹⁰

¹⁰The FFIEC adjusted census data is based on 2010 U.S. Census data and American Community Survey five-year estimate data; it also reflects changes in the 2013 OMB-revised MSA delineations.

Combined Demographics Report

Assessment Area: Billings MSA 2017

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6	838	2.0	169	20.2	8,218	19.8
Moderate-income	10	26.3	7,694	18.5	1,184	15.4	7,581	18.2
Middle-income	22	57.9	25,858	62.2	1,782	6.9	9,119	21.9
Upper-income	5	13.2	7,174	17.3	238	3.3	16,646	40.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	38	100.0	41,564	100.0	3,373	8.1	41,564	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	#
Low-income	1,635	510	1.1	31.2	996	60.9	129	7.9
Moderate-income	17,037	8,655	19.0	50.8	7,011	41.2	1,371	8.0
Middle-income	43,265	28,210	61.9	65.2	10,589	24.5	4,466	10.3
Upper-income	10,784	8,225	18.0	76.3	2,046	19.0	513	4.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	72,721	45,600	100.0	62.7	20,642	28.4	6,479	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	211	2.5	166	2.2	43	5.4	2	2.4
Moderate-income	2,614	30.5	2,255	29.4	331	41.4	28	34.1
Middle-income	4,654	54.4	4,221	55.0	389	48.6	44	53.7
Upper-income	1,081	12.6	1,036	13.5	37	4.6	8	9.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,560	100.0	7,678	100.0	800	100.0	82	100.0
Percentage of Total Businesses:			89.7		9.3		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.7	3	0.7	0	0.0	0	0.0
Moderate-income	75	17.9	75	18.3	0	0.0	0	0.0
Middle-income	274	65.2	265	64.6	9	90.0	0	0.0
Upper-income	68	16.2	67	16.3	1	10.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	420	100.0	410	100.0	10	100.0	0	0.0
Percentage of Total Farms:			97.6		2.4		0.0	

2017 FFIEC Census Data and 2017 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the Billings MSA for the year of loan origination. The following table shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Billings, MT MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2016	\$69,200	0 - \$34,599	\$34,600 - \$55,359	\$55,360 - \$83,039	\$83,040 - & above
2017	\$67,400	0 - \$33,699	\$33,700 - \$53,919	\$53,920 - \$80,879	\$80,880 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family for the Billings MSA, which was \$61,572 for 2016 and \$66,980 in 2017.

Population. According to 2017 FFIEC census data, the population of the assessment area is 164,716. The vast majority (93.3%) of the population lives in Yellowstone County, which includes Billings, the largest city by population in the state. The majority of the Billings MSA population in the assessment area, 52.9%, is 25 to 64 years of age. The remaining population by age is 23.3% for residents 17 years and younger, 8.4% for residents aged 18 to 24 years, and 15.5% for residents 65 years and older.

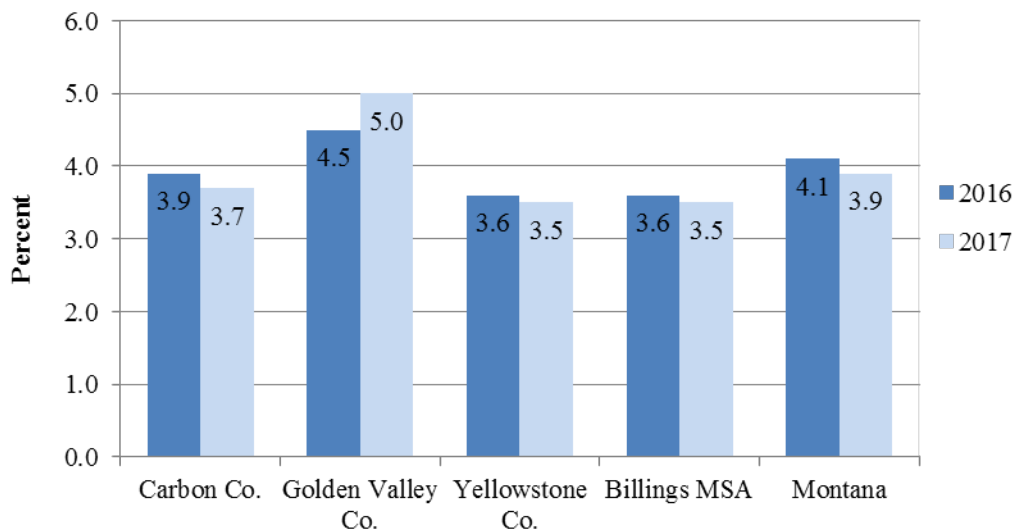
Housing Information. Based on 2017 adjusted census data, this assessment area has 72,721 housing units: 62.7% are owner-occupied, 28.4% are rental units, and 8.9% are vacant. The median age of the housing stock is 45 years, which is somewhat higher than the statewide median of 39 years. The median housing value is \$193,451 and the affordability ratio is 27.3, compared to 24.4 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

Affordable housing is a continued concern in the assessment area. A community contact indicated there is a lack of affordable housing, particularly with rental housing that is in good condition. Another contact stated that newer rental units in the assessment area are not affordable for low- and moderate-income individuals. Affordable housing units are difficult to develop because of many economic factors, including return on investment and limited availability of builders. According to a community contact, the availability of high-quality, single-family homes is low and prices are high. This contact also indicated that most new construction is generally geared toward buyers who would be classified as middle- or upper-income. Bank management also noted that housing prices continue to increase at a faster pace than wages. The increase in housing prices, along with higher interest rates, makes homeownership difficult for some people.

General Economic and Business Information. Bank management and community contacts indicated the region’s economy is strong. During the evaluation period, unemployment was low and wages increased. A number of industries provide employment for residents of the assessment area. First, Billings is home to several large health-care facilities, including hospitals. In addition, higher-education campuses, including a public university, provide jobs and draw additional residents to the area. Other area employers are in the industries of mining, agriculture, tourism, and retail, as well as the local governments. Retail, cultural, and entertainment activities also attract many visitors to the Billings area.

The agricultural economy includes some crops but is mainly comprised of livestock operations. According to bank management, a correction in cattle prices occurred in 2016. While prices improved in 2017, the prices did not return to as high as they were in 2015. Bank management indicated that fires and drought also adversely impacted farmers and ranchers during the evaluation period. As shown in the Unemployment Rates chart, the unemployment rates vary throughout the counties in the assessment area. However, the unemployment rate has, overall, decreased slightly in the Billings MSA during the evaluation period.

Unemployment Rates - Billings MT MSA



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BILLINGS MSA

The bank’s Lending Test performance in the Billings MSA assessment area is excellent. Lending levels show excellent responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The geographic distribution and dispersion of loans is also good. The bank is a leader in originating community development loans. The bank continues to extensively use flexible loan programs for low- and moderate-income borrowers and makes use of flexible loan programs for small businesses in the assessment area. Examiners assigned the most weight to HMDA loans, followed by small business lending and consumer lending. Small farm lending received the least weight.

The Investment Test performance is excellent. The bank’s qualified investment securities and community development investment donations are excellent. The bank makes extensive use of innovative or complex investments to support community development initiatives. The bank exhibits excellent responsiveness to credit and community development needs.

Under the Service Test, the bank’s delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provided a relatively high level of community development services.

LENDING TEST

The bank’s Lending Test performance in the Billings MSA assessment area is excellent.

Lending Activity

The bank’s lending activity reflects excellent responsiveness to assessment area credit needs. In 2016, the bank ranked 1st among 164 lenders reporting HMDA loan data with a 10.6% market share. In 2017, the bank ranked 3rd among 154 lenders reporting HMDA loan data with an 8.5% market share. For small businesses and small farms, the bank ranked 3rd among 58 lenders reporting CRA small business and

small farm loan data in 2016 with a 10.0% market share. In 2017, the bank ranked 2nd among 67 lenders reporting CRA small business and small farm loan data with a 12.4% market share. During the evaluation period, lending activity in this assessment area represented 13.1% by number and 13.2% by dollar amount of the bank's total lending. Within the bank's Montana assessment areas, the lending activity in the Billings MSA assessment area was 25.5% by number and 25.3% by dollar amount.

Distribution by Business Size and by Borrower Income Level

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is excellent. At the loan product level, examiners did not evaluate the bank's multifamily loans because of low lending volume. The following table shows the bank's HMDA loan data by income level and product type for 2016 and 2017. The table also includes aggregate lending data for each year.

Borrower Distribution of HMDA Loans
Assessment Area: Billings MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016						2017					
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar	#	%	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	\$ (000s)	\$ %	#				%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	32	8.4%	\$4,007	5.3%	19.8%	40	8.1%	5.7%	\$4,532	4.6%	3.3%	32	8.4%	4.7%	\$4,007	5.3%	2.8%
	Moderate	83	21.9%	\$12,952	17.2%	18.2%	115	23.2%	18.6%	\$18,255	18.5%	14.7%	83	21.9%	17.4%	\$12,952	17.2%	13.6%
	Middle	100	26.4%	\$19,298	25.6%	21.9%	143	28.8%	26.3%	\$27,628	28.1%	25.3%	100	26.4%	23.3%	\$19,298	25.6%	22.3%
	Upper	152	40.1%	\$37,190	49.4%	40.0%	181	36.5%	31.7%	\$45,978	46.7%	39.9%	152	40.1%	33.3%	\$37,190	49.4%	40.4%
	Unknown	12	3.2%	\$1,859	2.5%	0.0%	17	3.4%	17.7%	\$2,073	2.1%	16.7%	12	3.2%	21.4%	\$1,859	2.5%	21.0%
	Total	379	100.0%	\$75,306	100.0%	100.0%	496	100.0%	100.0%	\$98,466	100.0%	100.0%	379	100.0%	100.0%	\$75,306	100.0%	100.0%
REFINANCE	Low	12	10.3%	\$1,239	5.7%	19.8%	13	5.5%	5.8%	\$1,506	3.3%	3.1%	12	10.3%	6.5%	\$1,239	5.7%	3.4%
	Moderate	24	20.5%	\$2,885	13.3%	18.2%	54	22.7%	15.1%	\$7,569	16.6%	11.2%	24	20.5%	15.2%	\$2,885	13.3%	10.8%
	Middle	19	16.2%	\$3,425	15.8%	21.9%	58	24.4%	19.9%	\$10,368	22.7%	17.9%	19	16.2%	19.6%	\$3,425	15.8%	17.1%
	Upper	59	50.4%	\$13,213	60.8%	40.0%	107	45.0%	33.4%	\$24,174	52.9%	41.0%	59	50.4%	37.4%	\$13,213	60.8%	45.9%
	Unknown	3	2.6%	\$968	4.5%	0.0%	6	2.5%	25.8%	\$2,078	4.5%	26.8%	3	2.6%	21.3%	\$968	4.5%	22.8%
	Total	117	100.0%	\$21,730	100.0%	100.0%	238	100.0%	100.0%	\$45,695	100.0%	100.0%	117	100.0%	100.0%	\$21,730	100.0%	100.0%
HOME IMPROVEMENT	Low	2	4.1%	\$6	0.1%	19.8%	7	14.9%	10.2%	\$331	7.5%	4.6%	2	4.1%	8.3%	\$6	0.1%	4.2%
	Moderate	11	22.4%	\$919	21.0%	18.2%	5	10.6%	17.3%	\$641	14.6%	16.0%	11	22.4%	17.9%	\$919	21.0%	14.4%
	Middle	13	26.5%	\$994	22.7%	21.9%	10	21.3%	26.4%	\$901	20.5%	23.9%	13	26.5%	22.2%	\$994	22.7%	17.2%
	Upper	21	42.9%	\$2,423	55.2%	40.0%	22	46.8%	38.7%	\$2,379	54.2%	46.8%	21	42.9%	45.1%	\$2,423	55.2%	54.5%
	Unknown	2	4.1%	\$44	1.0%	0.0%	3	6.4%	7.4%	\$134	3.1%	8.8%	2	4.1%	6.5%	\$44	1.0%	9.7%
	Total	49	100.0%	\$4,386	100.0%	100.0%	47	100.0%	100.0%	\$4,386	100.0%	100.0%	49	100.0%	100.0%	\$4,386	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$776	100.0%	0.0%	2	100.0%	100.0%	\$5,211	100.0%	100.0%	4	100.0%	100.0%	\$776	100.0%	100.0%
	Total	4	100.0%	\$776	100.0%	100.0%	2	100.0%	100.0%	\$5,211	100.0%	100.0%	4	100.0%	100.0%	\$776	100.0%	100.0%
HMDA TOTALS	Low	46	8.4%	\$5,252	5.1%	19.8%	60	7.7%	5.9%	\$6,369	4.1%	3.2%	46	8.4%	5.4%	\$5,252	5.1%	2.9%
	Moderate	118	21.5%	\$16,756	16.4%	18.2%	174	22.2%	17.1%	\$26,465	17.2%	13.0%	118	21.5%	16.7%	\$16,756	16.4%	12.1%
	Middle	132	24.0%	\$23,717	23.2%	21.9%	211	26.9%	23.8%	\$38,897	25.3%	21.7%	132	24.0%	22.0%	\$23,717	23.2%	19.5%
	Upper	232	42.3%	\$52,826	51.7%	40.0%	310	39.6%	32.6%	\$72,531	47.2%	39.1%	232	42.3%	35.1%	\$52,826	51.7%	40.4%
	Unknown	21	3.8%	\$3,647	3.6%	0.0%	28	3.6%	20.5%	\$9,496	6.2%	23.1%	21	3.8%	20.7%	\$3,647	3.6%	25.2%
	Total	549	100.0%	\$102,198	100.0%	100.0%	783	100.0%	100.0%	\$153,758	100.0%	100.0%	549	100.0%	100.0%	\$102,198	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

In 2016, the bank's overall lending to low-income borrowers was comparable to aggregate lenders and was below demographics. The bank's overall lending to moderate-income borrowers in 2016 exceeded aggregate lenders and demographics when lending to moderate-income borrowers, which is notable

considering the shortage of affordable housing in the assessment area. Based on 2016 adjusted census data, 19.2% of families in the assessment area were low income and 18.3% of families were moderate income.

In 2017, overall, the bank's lending slightly exceeded aggregate lenders when lending to low- and moderate-income borrowers. The bank's lending exceeded demographics when lending to moderate-income borrowers and was below demographics when lending to low-income borrowers. This bank's overall performance is notable given the affordability issues and given that the bank only has a small percentage (10.6% in 2016 and 8.5% in 2017) of the HMDA-lending market share in the assessment area.

Using the assumption that a borrower can afford a home for approximately three times their annual income, an individual with the highest income in the low-income bracket (\$33,699) could afford a \$101,097 house. The calculation is based on the 2017 FFIEC estimated median family income of \$67,400 for the MSA. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$53,919), a borrower could afford a \$161,757 home. According to the 2017 FFIEC adjusted census data, the median housing value in the assessment area is \$193,451. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers. This information is consistent with statements from community contacts who indicated there is a lack of sufficient affordable housing in the area. According to a community contact, the availability of high-quality, single-family homes is low and prices are high.

The bank made extensive use of flexible lending programs in order to meet the credit needs of low- and moderate-income borrowers. In this assessment area, the bank participated in MBOH, Home\$tart, NeighborWorks, Fannie Mae HomeReady, and City of Billings First Time Homebuyer programs, which help low- and moderate-income borrowers afford homeownership. Some of these programs included down payment and closing cost assistance. The bank's extensive use of these programs enhances its performance in originating HMDA loans. For more information on these lending programs, refer to the Institution section of this evaluation.

Consumer. The bank's consumer lending to low- and moderate-income borrowers is good. The following tables show the bank's consumer lending by product for each year.

2016 Consumer Loan Distribution by Income Level of Borrower Billings MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	9	700	4.0	3.6	19.2
Moderate	27	1,994	12.1	10.1	18.3
Middle	49	3,276	21.9	16.7	23.4
Upper	110	11,115	49.1	56.5	39.2
Unknown	29	2,576	12.9	13.1	0.0
Total	224	19,661	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	136	1,714	13.8	7.5	23.0
Moderate	173	3,282	17.6	14.4	16.8
Middle	230	5,169	23.4	22.6	19.1
Upper	423	12,376	43.0	54.1	41.1
Unknown	22	328	2.2	1.4	0.0
Total	984	22,869	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	59	397	10.9	3.4	23.0
Moderate	91	1,312	16.8	11.2	16.8
Middle	126	2,222	23.2	19.0	19.1
Upper	237	7,122	43.7	61.0	41.1
Unknown	29	620	5.4	5.3	0.0
Total	542	11,673	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	22	58	8.2	2.3	23.0
Moderate	37	285	13.8	11.1	16.8
Middle	29	273	10.8	10.6	19.1
Upper	41	1,113	15.3	43.2	41.1
Unknown	139	847	51.9	32.9	0.0
Total	268	2,576	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	226	2,869	11.2	5.1	NA
Moderate	328	6,873	16.3	12.1	NA
Middle	434	10,940	21.5	19.3	NA
Upper	811	31,726	40.2	55.9	NA
Unknown	219	4,371	10.9	7.7	NA
Total	2,018	56,779	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Billings MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	7	203	3.7	1.5	19.8
Moderate	19	911	10.1	6.6	18.2
Middle	38	2,858	20.1	20.7	21.9
Upper	108	8,767	57.1	63.6	40.0
Unknown	17	1,048	9.0	7.6	0.0
Total	189	13,787	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	45	555	8.7	5.0	23.6
Moderate	99	1,674	19.1	15.1	16.2
Middle	125	2,668	24.2	24.1	18.2
Upper	232	5,933	44.9	53.7	42.0
Unknown	16	228	3.1	2.1	0.0
Total	517	11,058	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	43	316	11.1	3.8	23.6
Moderate	51	688	13.1	8.3	16.2
Middle	86	1,414	22.2	17.0	18.2
Upper	192	5,633	49.5	67.6	42.0
Unknown	16	280	4.1	3.4	0.0
Total	388	8,331	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	41	191	11.1	6.7	23.6
Moderate	33	333	8.9	11.7	16.2
Middle	29	202	7.9	7.1	18.2
Upper	55	1,014	14.9	35.6	42.0
Unknown	211	1,110	57.2	38.9	0.0
Total	369	2,850	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	136	1,265	9.3	3.5	NA
Moderate	202	3,606	13.8	10.0	NA
Middle	278	7,142	19.0	19.8	NA
Upper	587	21,347	40.1	59.3	NA
Unknown	260	2,666	17.8	7.4	NA
Total	1,463	36,026	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank's overall lending to low-income borrowers was below demographics and generally consistent with demographics for lending to moderate-income borrowers. For home equity and other unsecured loans, the bank's lending was below demographics for moderate-income borrowers. In 2017,

the bank's overall lending was below demographics when lending to low- and moderate-income borrowers. For motor vehicle loans, the bank's lending was consistent with demographics for moderate-income borrowers.

In both years, the bank's lowest level of lending to low- and moderate-income borrowers was in home equity lending. This level of performance, however, is reasonable. As previously discussed, affordable housing is a concern in the assessment area. With respect to home equity loans, low- and moderate-income individuals may have difficulty purchasing a home or may lack sufficient equity for these types of loans.

To meet consumer credit needs in the Billings MSA assessment area, the bank continues to offer a flexible loan program called First Care Credit. The unsecured loan program allows individuals to repay medical expenses over time at reasonable interest rates, according to bank management. Although income information is unavailable for these borrowers, the program likely helps meet the credit needs of low- and moderate-income borrowers who need longer repayment periods.

The bank also continues to offer small-dollar consumer loans. The bank originated 9.9% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 81.4% were to low- and moderate-income borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the low- and moderate-income borrowers in the assessment area.

Small Business. The distribution of small business loans among businesses of different sizes is good. The following table shows the bank's small business and small farm loans by revenue and loan size for the evaluation period. The table also includes aggregate lending data for each year.

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Billings MSA

Product Type	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
	2017					2016					2017								
	Bank		Dollar		Total Businesses	Count		Dollar			Count		Dollar						
	#	%	\$ (000s)	\$ %		#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	237	48.9%	\$16,323	34.4%	89.7%	267	43.6%	40.7%	\$17,939	31.7%	39.5%	237	48.9%	53.5%	\$16,323	34.4%	45.2%
		Over \$1 Million	215	44.3%	\$29,106	61.3%	9.3%	291	47.5%					215	44.3%				
		Total Rev. available	452	93.2%	\$45,429	95.7%	99.0%	558	91.1%					452	93.2%				
		Rev. Not Known	33	6.8%	\$2,021	4.3%	1.0%	54	8.8%					33	6.8%				
		Total	485	100.0%	\$47,450	100.0%	100.0%	612	100.0%					485	100.0%				
	Loan Size	\$100,000 or Less	383	79.0%	\$12,070	25.4%		482	78.8%	93.7%	\$15,071	26.6%	41.6%	383	79.0%	91.0%	\$12,070	25.4%	34.5%
		\$100,001 - \$250,000	58	12.0%	\$10,345	21.8%		76	12.4%	3.5%	\$13,489	23.8%	17.0%	58	12.0%	5.1%	\$10,345	21.8%	19.2%
		\$250,001 - \$1 Million	44	9.1%	\$25,035	52.8%		54	8.8%	2.8%	\$28,003	49.5%	41.5%	44	9.1%	3.9%	\$25,035	52.8%	46.3%
		Total	485	100.0%	\$47,450	100.0%		612	100.0%	100.0%	\$56,563	100.0%	100.0%	485	100.0%	100.0%	\$47,450	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	195	82.3%	\$5,828	35.7%													
\$100,001 - \$250,000		32	13.5%	\$5,718	35.0%														
\$250,001 - \$1 Million		10	4.2%	\$4,777	29.3%														
Total		237	100.0%	\$16,323	100.0%														
Small Farm	Revenue	\$1 Million or Less	83	87.4%	\$5,799	69.9%	97.6%	66	80.5%	74.3%	\$4,899	77.0%	81.4%	83	87.4%	75.1%	\$5,799	69.9%	78.0%
		Over \$1 Million	10	10.5%	\$2,413	29.1%	2.4%	6	7.3%					10	10.5%				
		Total Rev. available	93	97.9%	\$8,212	99.0%	100.0%	72	87.8%					93	97.9%				
		Not Known	2	2.1%	\$80	1.0%	0.0%	10	12.2%					2	2.1%				
		Total	95	100.0%	\$8,292	100.0%	100.0%	82	100.0%					95	100.0%				
	Loan Size	\$100,000 or Less	71	74.7%	\$2,642	31.9%		63	76.8%	74.3%	\$2,189	34.4%	28.2%	71	74.7%	77.0%	\$2,642	31.9%	29.2%
		\$100,001 - \$250,000	17	17.9%	\$2,943	35.5%		13	15.9%	17.3%	\$2,059	32.4%	34.9%	17	17.9%	14.6%	\$2,943	35.5%	33.0%
		\$250,001 - \$500,000	7	7.4%	\$2,707	32.6%		6	7.3%	8.5%	\$2,112	33.2%	36.9%	7	7.4%	8.4%	\$2,707	32.6%	37.7%
		Total	95	100.0%	\$8,292	100.0%		82	100.0%	100.0%	\$6,360	100.0%	100.0%	95	100.0%	100.0%	\$8,292	100.0%	100.0%
	Loan Size & Rev \$1 Mill or	\$100,000 or Less	67	80.7%	\$2,443	42.1%													
\$100,001 - \$250,000		12	14.5%	\$1,943	33.5%														
\$250,001 - \$500,000		4	4.8%	\$1,413	24.4%														
Total	83	100.0%	\$5,799	100.0%															

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data and 2017 D&B Information

In 2016, the bank’s lending to small businesses was consistent with aggregate lenders. In 2017, the bank’s lending to small businesses was below aggregate lenders. According to 2016 D&B data, 90.7% of businesses in the assessment area had gross annual revenues of \$1 million or less; the figure was 89.7% in 2017. For both years, the bank and aggregate lenders were below demographic data.

The bank’s lending performance is reasonable because the bank competes against many institutions, including credit card lenders, and outperformed all but two aggregate reporters in 2016 and all but one in 2017. The majority of the bank’s small business loans to small businesses were for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of all businesses, especially small businesses, since smaller organizations tend to request smaller-dollar loans.

Finally, the bank used flexible loan programs in this assessment area, which enhanced its small business lending performance. Specifically, the bank participated in SBA lending programs, which help meet the needs of the small businesses in the area.

Small Farm. The distribution of small farm loans among farms of different sizes is excellent. For both years, the bank lending to small farms exceeded aggregate lenders, by number of loans, but was below demographics. According to 2016 D&B data, 98.0% of farms had gross annual revenues of \$1 million or less; that figure was 97.6% in 2017.

The bank is one of the leading aggregate reporters in the assessment area for small farm loans. However, it had only 20.5% and 19.9% of the small farm market share in 2016 and 2017, respectively. The bank operates in a highly competitive banking environment for small farm loans; however, the bank exceeded

aggregate lender performance for originating small farm loans in 2016 and 2017. The majority of the bank’s small farm loans were for amounts of \$100,000 or less, which indicates a willingness to meet the credit needs of all farms, as smaller operations tend to request smaller-dollar loans.

Geographic Distribution

Overall, the geographic distribution of the bank’s HMDA, consumer, small business, and small farm loans in the Billings MSA is good and does not reveal any unexplained gaps in lending. As of 2017, the assessment area had 1 low-, 10 moderate-, 22 middle-, and 5 upper-income census tracts. This is a change from 2016, when the Billings MSA had 1 low-, 5 moderate-, 26 middle-, and 6 upper-income census tracts. For both years, the majority of tracts in this assessment area were middle-income (68.4% in 2016 and 57.9% in 2017). The bank has four branches in moderate-income tracts, three in middle-income tracts, and one in an upper-income tract. The bank originated at least one loan in all census tracts during the evaluation period.

Residential Real Estate. The geographic distribution of the bank’s HMDA loans is good. At the product level, examiners did not evaluate the bank’s multifamily loans because of limited loan volume.

Geographic Distribution of HMDA Loans
Assessment Area: Billings MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	%	Dollar	%		#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	3	0.8%	\$301	0.4%	1.1%	14	2.8%	1.4%	\$1,385	1.4%	0.9%	3	0.8%	0.9%	\$301	0.4%	0.5%
	Moderate	64	16.9%	\$10,394	13.8%	19.0%	44	8.9%	7.5%	\$5,801	5.9%	5.1%	64	16.9%	15.2%	\$10,394	13.8%	12.4%
	Middle	245	64.6%	\$49,011	65.1%	61.9%	326	65.7%	68.8%	\$63,398	64.4%	67.8%	245	64.6%	64.4%	\$49,011	65.1%	63.8%
	Upper	67	17.7%	\$15,600	20.7%	18.0%	112	22.6%	22.2%	\$27,882	28.3%	26.2%	67	17.7%	19.5%	\$15,600	20.7%	23.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	379	100.0%	\$75,306	100.0%	100.0%	496	100.0%	100.0%	\$98,466	100.0%	100.0%	379	100.0%	100.0%	\$75,306	100.0%	100.0%
REFINANCE	Low	2	1.7%	\$310	1.4%	1.1%	4	1.7%	1.6%	\$838	1.8%	1.1%	2	1.7%	1.5%	\$310	1.4%	0.8%
	Moderate	22	18.8%	\$3,929	18.1%	19.0%	13	5.5%	6.6%	\$1,679	3.7%	4.5%	22	18.8%	15.6%	\$3,929	18.1%	13.8%
	Middle	68	58.1%	\$12,419	57.2%	61.9%	166	69.7%	68.4%	\$32,169	70.4%	68.5%	68	58.1%	63.4%	\$12,419	57.2%	62.1%
	Upper	25	21.4%	\$5,072	23.3%	18.0%	55	23.1%	23.4%	\$11,009	24.1%	25.9%	25	21.4%	19.5%	\$5,072	23.3%	23.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	117	100.0%	\$21,730	100.0%	100.0%	238	100.0%	100.0%	\$45,695	100.0%	100.0%	117	100.0%	100.0%	\$21,730	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.6%	\$0	0.0%	1.3%	0	0.0%	2.5%	\$0	0.0%	1.9%
	Moderate	6	12.2%	\$269	6.1%	19.0%	5	10.6%	6.3%	\$351	8.0%	4.4%	6	12.2%	16.4%	\$269	6.1%	11.9%
	Middle	39	79.6%	\$4,014	91.5%	61.9%	35	74.5%	72.5%	\$3,495	79.7%	72.1%	39	79.6%	60.5%	\$4,014	91.5%	59.4%
	Upper	4	8.2%	\$103	2.3%	18.0%	7	14.9%	19.5%	\$540	12.3%	22.2%	4	8.2%	20.7%	\$103	2.3%	26.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$4,386	100.0%	100.0%	47	100.0%	100.0%	\$4,386	100.0%	100.0%	49	100.0%	100.0%	\$4,386	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	1	25.0%	\$168	21.6%	4.9%	1	50.0%	14.3%	\$4,626	88.8%	9.5%	1	25.0%	16.0%	\$168	21.6%	1.9%
	Moderate	3	75.0%	\$608	78.4%	40.2%	0	0.0%	23.8%	\$0	0.0%	2.6%	3	75.0%	44.0%	\$608	78.4%	10.2%
	Middle	0	0.0%	\$0	0.0%	41.3%	1	50.0%	57.1%	\$585	11.2%	51.3%	0	0.0%	28.0%	\$0	0.0%	45.2%
	Upper	0	0.0%	\$0	0.0%	13.6%	0	0.0%	4.8%	\$0	0.0%	36.7%	0	0.0%	12.0%	\$0	0.0%	42.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	4	100.0%	\$776	100.0%	100.0%	2	100.0%	100.0%	\$5,211	100.0%	100.0%	4	100.0%	100.0%	\$776	100.0%	100.0%	
HMDA TOTALS	Low	6	1.1%	\$779	0.8%	1.1%	19	2.4%	1.5%	\$6,849	4.5%	1.3%	6	1.1%	1.3%	\$779	0.8%	0.7%
	Moderate	95	17.3%	\$15,200	14.9%	19.0%	62	7.9%	7.2%	\$7,831	5.1%	4.8%	95	17.3%	15.5%	\$15,200	14.9%	12.7%
	Middle	352	64.1%	\$65,444	64.0%	61.9%	528	67.4%	68.8%	\$99,647	64.8%	67.6%	352	64.1%	63.7%	\$65,444	64.0%	62.3%
	Upper	96	17.5%	\$20,775	20.3%	18.0%	174	22.2%	22.5%	\$39,431	25.6%	26.3%	96	17.5%	19.5%	\$20,775	20.3%	24.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	549	100.0%	\$102,198	100.0%	100.0%	783	100.0%	100.0%	\$153,758	100.0%	100.0%	549	100.0%	100.0%	\$102,198	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016, overall, the bank's lending in low- and moderate-income census tracts was consistent with aggregate lenders. The bank's 2016 lending was consistent with demographics for the low-income tract and below demographics for the moderate-income tracts. According to 2016 census data, 1.6% of the families in the assessment area reside in low-income tracts, and 11.3% reside in moderate-income tracts. In addition, only 1.0% of owner-occupied units are located in low-income tracts, and a 9.5% are in moderate-income tracts. HMDA lending opportunities in the low- and moderate-income tracts are limited, given the composition of the housing units in the assessment area. The majority (59.6%) of the housing units in low-income tracts are rental properties, according to demographic data. In addition, 16.5% of housing units in the low-income tracts are vacant. In moderate-income tracts, 48.8% of the housing units are owner-occupied and 6.8% of the housing units are vacant, providing lenders with slightly more opportunity to lend in the moderate-income tracts.

In 2017, overall, the bank's lending in low- and moderate-income census tracts was consistent with aggregate lenders and demographics; however, the bank's home improvement lending in moderate-income tracts was below demographics. According to 2017 census data, a very small percentage of the families in the assessment area reside in the low-income tract, and 18.5% reside in moderate-income tracts. In addition, 1.1% and 19.0% of owner-occupied units are located in low- and moderate-income tracts, respectively. The majority (60.9%) of the housing units in the low-income tract are rental properties, according to demographic data. In addition, 7.9% of housing units in the low-income tract are vacant. In moderate-income tracts, 41.2% of the housing units are owner occupied and 8.0% of the housing units are vacant, providing lenders with slightly more opportunity to lend in the moderate-income tracts.

The bank made HMDA loans in all of the census tracts in the assessment area with the exception of the moderate-income tract in Golden Valley County. This lack of lending is reasonable since the county is rural and more sparsely populated than other areas in the assessment area, and the bank does not have a branch in the county. The demographics of the low- and moderate-income census tracts make it difficult for the bank to make HMDA loans in these tracts. In addition, Billings has extensive banking opportunities for residents, and the bank faces considerable competition for HMDA loans in its assessment area. Despite these challenges, the bank was still able to lend in the low- and moderate-income tracts in the assessment area.

Consumer. The geographic distribution and dispersion of the bank's consumer loans is good. The following tables show the bank's consumer loans by census tract income level and product type for 2016 and 2017. Aggregate lending data is not available for consumer lending.

2016 Consumer Loan Distribution by Income Level of Geography					
Billings MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	3	77	1.3	0.4	1.0
Moderate	9	535	4.0	2.7	9.5
Middle	150	13,732	67.0	69.8	69.5
Upper	62	5,317	27.7	27.0	20.0
Unknown	0	0	0.0	0.0	0.0
Total	224	19,661	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	13	277	1.3	1.2	2.6
Moderate	72	1,417	7.3	6.2	12.8
Middle	706	16,339	71.7	71.4	68.1
Upper	193	4,836	19.6	21.1	16.6
Unknown	0	0	0.0	0.0	0.0
Total	984	22,869	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	5	75	0.9	0.6	2.6
Moderate	42	674	7.7	5.8	12.8
Middle	404	8,787	74.5	75.3	68.1
Upper	91	2,137	16.8	18.3	16.6
Unknown	0	0	0.0	0.0	0.0
Total	542	11,673	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	15	1.5	0.6	2.6
Moderate	28	141	10.4	5.5	12.8
Middle	174	1,769	64.9	68.7	68.1
Upper	62	651	23.1	25.3	16.6
Unknown	0	0	0.0	0.0	0.0
Total	268	2,576	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	25	444	1.2	0.8	NA
Moderate	151	2,767	7.5	4.9	NA
Middle	1434	40,627	71.1	71.6	NA
Upper	408	12,941	20.2	22.8	NA
Unknown	0	0	0.0	0.0	NA
Total	2018	56,779	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Billings MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	1.1
Moderate	27	2,121	14.3	15.4	19.0
Middle	111	7,720	58.7	56.0	61.9
Upper	51	3,946	27.0	28.6	18.0
Unknown	0	0	0.0	0.0	0.0
Total	189	13,787	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	5	87	1.0	0.8	2.3
Moderate	69	1,241	13.3	11.2	23.6
Middle	353	7,766	68.3	70.2	58.6
Upper	90	1,964	17.4	17.8	15.5
Unknown	0	0	0.0	0.0	0.0
Total	517	11,058	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.3
Moderate	62	1,133	16.0	13.6	23.6
Middle	280	5,801	72.2	69.6	58.6
Upper	46	1,397	11.9	16.8	15.5
Unknown	0	0	0.0	0.0	0.0
Total	388	8,331	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	30	1.1	1.1	2.3
Moderate	67	387	18.2	13.6	23.6
Middle	248	1,647	67.2	57.8	58.6
Upper	50	786	13.6	27.6	15.5
Unknown	0	0	0.0	0.0	0.0
Total	369	2,850	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	9	117	0.6	0.3	NA
Moderate	225	4,882	15.4	13.6	NA
Middle	992	22,934	67.8	63.7	NA
Upper	237	8,093	16.2	22.5	NA
Unknown	0	0	0.0	0.0	NA
Total	1463	36,026	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank’s lending performance was generally consistent with demographics in the low-income census tract and was below demographics in moderate-income tracts. The bank’s lending in moderate-income tracts was consistent with demographics for other unsecured loans. A small percentage of households lived in the low-income tract. In 2016, in the low-income census tract, 7.7% of households had rental costs greater than 30% of their income, and 6.9% of households lived below poverty level. For moderate-income tracts, 19.4% of households had rental costs greater than 30% of their income, and 20.7% lived below poverty level. These households were likely not able to afford a consumer loan. The

majority of households lived in middle-income tracts. Owner-occupied units in the low- and moderate-income census tracts were very low, at 1.0% and 9.5%, respectively.

In 2017, the bank’s lending performance was generally consistent with demographics in the low-income census tract and was below demographics in moderate-income tracts. In 2017, the majority of households resided in middle-income tracts, with a small percentage of households in the low-income tract. The percentages of owner-occupied units in the low- and moderate-income census tracts changed in 2017 because of the census tract changes but were still low at 1.1% and 19.0%, respectively. In addition, 5.5% and 38.4% of the households in the low- and moderate-income tracts, respectively, lived below the poverty level. These figures are similar to the percentages of households whose rental costs were greater than 30% of their incomes. These households were likely not able to afford a consumer loan.

The bank’s performance is reasonable, even though it was below demographics at times. The bank made consumer loans in the low-income census tract and each moderate-income tract during the evaluation period, as well as the other tracts in the assessment area. The low-income census tract and several moderate-income census tracts are located in an area where consumers have access to numerous banking options. Competition to provide banking products to consumers is strong throughout the assessment area.

Small Business. The geographic distribution of small business loans is excellent. The following table shows the geographic distribution of the bank’s small business and small farm loans, as well as aggregate lending data for 2016 and 2017.

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Billings MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2017					2016						2017						
		Count		Bank Dollar		Small Businesses	Count		Bank Dollar		Agg	Count		Bank Dollar		Agg			
#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %	\$ %					
SMALL BUSINESSES	Low	10	2.1%	\$1,814	3.8%	2.2%	71	11.6%	3.6%	\$7,830	13.8%	7.3%	10	2.1%	1.8%	\$1,814	3.8%	2.3%	
	Moderate	179	36.9%	\$17,354	36.6%	29.4%	79	12.9%	8.2%	\$6,616	11.7%	11.2%	179	36.9%	27.7%	\$17,354	36.6%	35.7%	
	Middle	257	53.0%	\$23,612	49.8%	55.0%	415	67.8%	64.7%	\$37,890	67.0%	66.5%	257	53.0%	54.4%	\$23,612	49.8%	49.8%	
	Upper	39	8.0%	\$4,670	9.8%	13.5%	47	7.7%	17.5%	\$4,227	7.5%	12.6%	39	8.0%	14.1%	\$4,670	9.8%	11.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	2.4%	0	0.0%	1.9%	\$0	0.0%	0.9%	
	Total	485	100.0%	\$47,450	100.0%	100.0%	612	100.0%	100.0%	\$56,563	100.0%	100.0%	485	100.0%	100.0%	\$47,450	100.0%	100.0%	
SMALL FARM	Small Farms																		
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.1%	
	Moderate	8	8.4%	\$490	5.9%	18.3%	2	2.4%	4.8%	\$126	2.0%	5.0%	8	8.4%	15.5%	\$490	5.9%	16.6%	
	Middle	78	82.1%	\$6,450	77.8%	64.6%	72	87.8%	86.8%	\$5,618	88.3%	86.1%	78	82.1%	75.7%	\$6,450	77.8%	72.2%	
	Upper	9	9.5%	\$1,352	16.3%	16.3%	8	9.8%	8.3%	\$616	9.7%	8.9%	9	9.5%	7.5%	\$1,352	16.3%	10.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	0.2%	
Total	95	100.0%	\$8,292	100.0%	100.0%	82	100.0%	100.0%	\$6,360	100.0%	100.0%	95	100.0%	100.0%	\$8,292	100.0%	100.0%		

Originations & Purchases
2017 FFIEC Census Data and 2017 D&B Information

In 2016, the bank’s lending exceeded aggregate lenders and demographic data for small business lending in low- and moderate-income tracts. According to 2016 D&B data, 3.0% of small businesses are located in the low-income tract, and 9.8% are located in the moderate-income tracts.

In 2017, the bank’s small business lending in the low-income tract was consistent with aggregate lenders and demographic data. For the same year, the bank’s small business lending exceeded aggregate lenders and demographic data in moderate-income tracts.

The bank originated a small business loan in every census tract of the assessment area during the evaluation period, with the exception of the moderate-income tract in Golden Valley County. This lack of

lending is reasonable because the county is rural and sparsely populated with very few businesses, as well as the fact that the bank does not have a branch in the county. This assessment area is competitive for banking services; businesses located in this tract would have access to many other financial entities in the assessment area.

Small Farm. The geographic distribution of small farm loans is good. For both years, the bank and aggregate lenders did not originate small farm loans in the low-income tract. This is reasonable, since the low-income tract is located in the Billings city limits and mostly commercial. According to 2017 D&B data, 0.7% of small farms are located in the low-income tract.

For small farm lending in moderate-income tracts, the bank’s lending in 2016 was comparable to aggregate lenders and below demographic data. In 2017, the bank’s lending was below aggregate lenders and demographic data. This performance is reasonable given the performance context. In 2016, the only rural moderate-income census tract comprised Golden Valley County, where the bank did not have a branch. In 2017, census tract changes added one additional rural moderate-income tract in Carbon County (previously designated as middle income), where the bank has one branch. The bank’s small farm lending in moderate-income census tracts increased from 2016 to 2017. According to D&B data, only 21 farms were located in this moderate-income tract and only 31 farms are located in the Golden Valley County census tract. In addition, the assessment area is very competitive for banking. Borrowers have access to many other financial entities throughout the assessment area, including in Carbon County.

The bank did not originate a small farm loan in every census tract of the assessment area during the evaluation period. This lack of lending in certain tracts is reasonable given the above-mentioned performance context. In addition, most of the tracts where the bank did not make loans are in Billings, as well as in Laurel, where few farms are located.

Community Development Lending

The bank is a leader in making community development loans in the Billings MSA, which reflects excellent responsiveness to the assessment area. Five of the bank’s community development loans focused on affordable housing, which bank management and community contacts said is a critical need in the assessment area. One large affordable housing loan for \$2.6 million was particularly impactful because it provided financing to construct a low- and moderate-income housing community in Billings. The other large affordable housing loan is for an apartment complex located in the low-income census tract near downtown Billings. Bank management and community contacts stated that rental opportunities are limited in the assessment area, especially for low- and moderate-income residents.

Community Development Lending in the Billings MSA		
<i>Purpose</i>	#	\$
Affordable Housing	5	7,794,821
Economic Development	1	1,598,000
Revitalize or Stabilize	2	333,425
Total	8	9,726,246

The bank originated two loans to an organization that helps revitalize and stabilize moderate-income tracts by renovating homes in these areas. Finally, the bank originated one economic development loan to a local business owner. The business will create jobs for low- and moderate-income residents in the assessment area.

INVESTMENT TEST

Overall, the bank has an excellent level of qualified community development investments and donations, which exhibit excellent responsiveness to the credit and community needs in the Billings assessment area. The investments that directly benefit the Billings assessment area totaled \$11.5 million for the evaluation

period. This includes \$8.2 million in new investments, \$2.8 in prior period investments, \$25,000 in prior-period equity equivalent investments, and \$436,717 in donations.

The bank has an excellent level of qualified investments. During the evaluation period, the bank made two new investments that support low- and moderate-income multifamily housing complexes. These investments demonstrate excellent responsiveness to the affordable housing needs in the assessment area. The bank’s prior-period investments also support affordable housing, as well as community service needs in the assessment area.

The bank made an excellent level of qualified investments in the form of donations, totaling \$436,717. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the Billings MSA		
<i>First Interstate Bank</i>	#	\$
Affordable Housing	11	18,250
Community Service	92	178,388
Economic	1	250
Revitalize or Stabilize	6	19,675
Total	110	216,563
<i>Foundation</i>	#	\$
Affordable Housing	2	300
Community Service	283	216,504
Economic Development	2	2,700
Revitalize or Stabilize	3	650
Total	290	220,154

SERVICE TEST

The bank’s retail service activities are readily accessible to residents, businesses, and farms throughout the assessment area, and services and hours do not vary in a way that inconveniences particular individual or areas. In addition, the bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different incomes. During the evaluation period, the bank operated eight full-service branches in the communities of Billings, Laurel, and Red Lodge. The bank did not close any branches during the evaluation period.

The bank’s services are tailored to the needs of its assessment area, particularly low- and moderate-income geographies and individuals. There are six branches in Billings; four are in moderate-income census tracts, one is in a middle-income census tract, and one is in an upper-income census tract. The Laurel and Red Lodge branches are both located in middle-income census tracts. All branches have ATMs, drive-up facilities, and extended hours; all but one branch have Saturday hours. The bank also operates seven stand-alone ATMs in this assessment area, two of which take deposits. The low-income census tract has a cash-dispensing-only ATM.

The following table shows the geographic distribution of branches and ATMs in this assessment area. Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts, and apply for some consumer loans. FIB offers reasonable service hours and provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

Geographic Distribution of Branches & ATMS

Assessment Area: Billings MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend Hours	Week-end Hours	Total ATMs		Full Service ATMs			Cash only ATMs			Census Tracts		House holds	Total Businesses			
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed			#	%	
Low	0	0.0%	0	0	0	0	0	Total	1	6.3%	0	0.0%	0	0	1	14.3%	0	0	1	2.6%	2.3%	2.5%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Moderate	4	50.0%	0	0	4	4	4	Total	9	56.3%	6	66.7%	0	0	3	42.9%	0	0	10	26.3%	23.6%	30.5%
DTO	0		0	0				SA	4		2		0	0	2		0	0				
Middle	3	37.5%	0	0	3	3	2	Total	5	31.3%	2	22.2%	0	0	3	42.9%	0	0	22	57.9%	58.6%	54.4%
DTO	0		0	0				SA	2		0		0	0	2		0	0				
Upper	1	12.5%	0	0	1	1	1	Total	1	6.3%	1	11.1%	0	0	0	0.0%	0	0	5	13.2%	15.5%	12.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	0	0	8	8	7	Total	16	100.0%	9	100.0%	0	0	7	100.0%	0	0	38	100.0%	100.0%	100.0%
DTO	0		0	0				SA	7		2		0	0	5		0	0				

2016 FFIEC Census Data, 2016 D&B Info, and 2015 ACS Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

The hours of operation are tailored to the convenience and needs of the assessment area, including low- and moderate-income individuals and geographies. The bank offers reasonable service hours and provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

Finally, the bank waives certain fees, such as fees for some home mortgage loans and service charges on deposit accounts, for accounts serviced for or held by some nonprofit organizations that primarily serve low- and moderate-income individuals in the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the Billings assessment area. Twenty-four bank employees provided 38 community development services during the evaluation period for 26 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as health care, food, and financial education. Bank employees also provided services with affordable housing purposes, which is responsive to affordable housing concerns in the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and presenters.

Community Development Services in the Billings MSA	
<i>Purpose</i>	#
Affordable Housing	7
Community Services	30
Economic Development	0
Revitalization and Stabilize	1
Total	38

NONMETROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KALISPELL, MONTANA, ASSESSMENT AREA

Bank Information. The bank currently operates eight full-service branches and one stand-alone drive-up facility in the Kalispell assessment area. All branches have lobby services, and seven have drive-up facilities with an ATM. The bank operates eight cash-dispensing-only ATMs and three deposit-taking ATMs. The bank has 9.9% of its branches in this assessment area. In 2016, the bank acquired a bank that had two existing branches in this assessment area – one in Lakeside and one in Big Fork. The bank closed its existing branch and ATM in Big Fork and kept the acquired branch open. See the Retail Services section of the Service Test for this assessment area for more details.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank ranks 2nd among 14 financial institutions operating in the assessment area, with a 20.2% deposit market share and \$527.9 million in deposits. The deposits in this assessment area represent 7.3% of the bank's overall deposits. The bank faces competition from several local community banks as well as regional banks, large national banks, and credit unions.

Assessment Area Information. The Kalispell assessment area is in northwestern Montana and borders on Canada and Idaho. The assessment area consists of Flathead, Lake, and Lincoln counties. At prior examinations the bank only included one tract in Lincoln County, but now the entire county is part of the Kalispell assessment area. The assessment area includes Glacier National Park, government-owned forest land, and a majority of the Flathead Indian Reservation. The reservation comprises six tracts in Lake County and a portion of one tract in Flathead County, as well as a portion of Sanders County outside of the assessment area. There is one moderate-income census tract in Lake County that is part of the reservation. The bank has a branch in Polson, which is located on the reservation.

The income classifications of some census tracts changed, based on 2017 FFIEC adjusted census data.¹¹ In 2016, the Kalispell assessment area included 1 low-, 7 moderate-, 21 middle-, and 3 upper-income census tracts. As of 2017, the assessment area has had 6 moderate-, 24 middle-, and 2 upper-income tracts, as shown in the table that follows. The Combined Demographics Report on the following page provides demographic information for this assessment area, based on 2017 FFIEC adjusted census data and 2017 D&B data.

¹¹ The FFIEC adjusted census data is based on 2010 U.S. Census data and American Community Survey five-year estimate data.

Combined Demographics Report

Assessment Area: Kalispell

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,996	21.4
Moderate-income	6	18.8	6,401	17.1	1,080	16.9	7,651	20.5
Middle-income	24	75.0	27,757	74.3	2,718	9.8	8,744	23.4
Upper-income	2	6.3	3,180	8.5	231	7.3	12,947	34.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	32	100.0	37,338	100.0	4,029	10.8	37,338	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	14,905	7,123	17.2	47.8	3,633	24.4	4,149	27.8
Middle-income	55,728	30,811	74.4	55.3	11,920	21.4	12,997	23.3
Upper-income	4,761	3,498	8.4	73.5	744	15.6	519	10.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	75,394	41,432	100.0	55.0	16,297	21.6	17,665	23.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,179	14.7	1,075	14.5	86	15.3	18	21.7
Middle-income	6,199	77.1	5,717	77.3	422	75.1	60	72.3
Upper-income	664	8.3	605	8.2	54	9.6	5	6.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,042	100.0	7,397	100.0	562	100.0	83	100.0
Percentage of Total Businesses:			92.0		7.0		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	92	18.4	92	18.9	0	0.0	0	0.0
Middle-income	365	73.1	357	73.3	8	66.7	0	0.0
Upper-income	42	8.4	38	7.8	4	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	499	100.0	487	100.0	12	100.0	0	0.0
Percentage of Total Farms:			97.6		2.4		0.0	

2017 FFIEC Census Data and 2017 D&B Information

American Indian Reservation. The Flathead Indian Reservation, home to the Confederated Salish and Kootenai Tribes, is in the southern portion of the assessment area. As noted previously, the reservation encompasses most of Lake County and part of one census tract in Flathead County, as well as land

outside of the assessment area. Tribal departments provide services related to affordable housing, education, health care, employment, and early childhood.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the nonmetropolitan areas of Montana for the applicable year of loan origination. The table below shows the estimated incomes for each year and the range that defines low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Montana State Nonmetropolitan Area**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2016	\$60,300	0 - \$30,149	\$30,150 - \$48,239	\$48,240 - \$72,359	\$72,360 - & above
2017	\$60,500	0 - \$30,249	\$30,250 - \$48,399	\$48,400 - \$72,599	\$72,600 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC adjusted census data median family income for the nonmetropolitan areas of Montana, which was \$54,061 for 2016 and \$59,958 for 2017.

Population. According to 2017 FFIEC census data, the population of the assessment area is 141,827. A majority (65.8%) of the population lives in Flathead County, which includes Kalispell, the largest city in the assessment area. The largest age group of the assessment area population, 52.1%, is 25 to 64 years of age. The remaining age groups are as follows: 22.5% of residents are 17 years and younger, 7.5% are 18 to 24 years of age, and 18.0% are 65 years and older.

Housing Information. According to 2017 adjusted census data, this assessment area has 75,394 housing units: 55.0% are owner-occupied, 21.6% are rental units, and 23.4% are vacant. The median age of the housing stock across the assessment area is 38 years, which is similar to the median housing age of 39 years for all nonmetropolitan areas of Montana. The median housing value is \$221,035, and the affordability ratio is 19.9. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability.

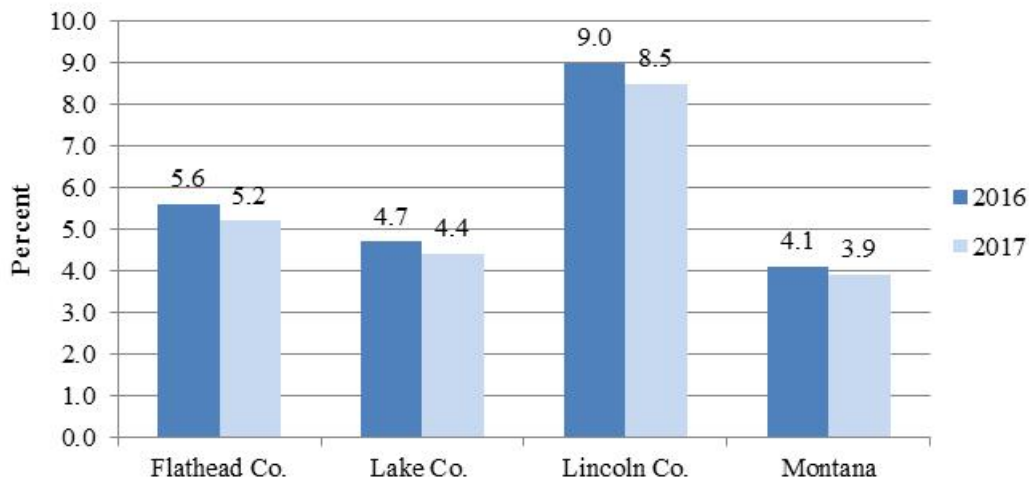
Affordable housing continues to be a significant challenge for many residents in the assessment area. Contacts noted that the supply of quality affordable housing is not sufficient. According to a contact, the rental market is tight with a vacancy rate below 1.0%. According to bank management, the average home sales prices is \$350,000. Local wages remain steady; for some people, they have increased, but generally they remain too low for many of the residents to afford homeownership. A contact stated that some individuals in the area have inherited their homes and then have to sell them due to struggling to afford homeownership, including high taxes. A contact also indicated that some land is available for home construction; however, construction costs are high. Some cities are using different methods, such as adopting certain zoning requirements or penalties, to help incentivize development of affordable housing in the area. According to bank management, higher-end vacation and second homes, as well as retirement homes, are a significant part of the real estate market. In addition, a community contact noted that local property owners and investors are offering their properties as short-term rentals through online vacation marketplaces. A community contact noted that high-net-worth people drive up housing costs.

General Economic and Business Information. The assessment area economy is doing well. Community contacts and bank management stated that the local economy is stable in Lake County and strong in Flathead County. Kalispell is growing rapidly, has many available jobs, and is a developing retail trade

center. The assessment area economy is diverse, with tourism, timber, health care, construction, and finance being the main drivers. Other sectors that are expanding and providing jobs include retail and call centers. The Confederated Salish and Kootenai Tribes’ government and entities continue to provide a significant number of jobs in the assessment area. Tourism has long been a key local industry, and it continues to grow. Glacier National Park draws approximately 3 million visitors to the area each year. According to a community contact, health care is a developing key industry that has brought high-paying jobs to the assessment area. Workforce development is a major challenge for local business. A contact noted that competition for labor is high, and small businesses that do not offer competitive salaries and benefits suffer.

As shown in the Unemployment Rates chart, the unemployment rates vary among the counties in the assessment area. Overall, the unemployment rate has decreased slightly in the Kalispell assessment area during the evaluation period, but it remains higher than the state average. A community contact noted that tribal member unemployment rates are higher than non-tribal rates.

Unemployment Rates - Kalispell MT



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KALISPELL ASSESSMENT AREA

The bank’s Lending Test performance in the Kalispell assessment area is good. Lending levels show good responsiveness to assessment area credit needs. The borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution and dispersion of loans is also good. The bank made a relatively high level of community development loans. The bank used flexible loan programs for low- and moderate-income borrowers and small businesses in the assessment area. Examiners assigned the most weight to HMDA loans, followed by small business and consumer lending.

The Investment Test performance is adequate. The bank’s qualified investment securities and community development investment donations are adequate and exhibit adequate responsiveness to credit and community development needs.

Under the Service Test, the bank’s delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further,

bank officers and employees provide an adequate level of community development services in the assessment area.

LENDING TEST

The bank's Lending Test performance in the Kalispell assessment area is good.

Lending Activity

The bank's lending activity reflects good responsiveness to assessment area credit needs. In 2016, the bank ranked 4th among 181 lenders reporting HMDA loan data, with a 6.3% market share. In 2017, the bank ranked 5th among 186 lenders reporting HMDA loan data, with a 5.3% market share. For small businesses and small farms, the bank ranked 5th among 71 lenders reporting small business and small farm loan data in 2016, with a 4.5% market share. In 2017, the bank ranked 5th among 65 lenders reporting CRA small business and small farm loan data, with a 7.9% market share. During the evaluation period, lending activity in this assessment area represented 7.1% by number and 7.5% by dollar amount of the bank's total lending. Within the bank's Montana assessment areas, the lending activity in the Kalispell assessment area was 14.6% by number and 14.7% by dollar amount.

Distribution Borrower Income Level and by Size of Business

Overall, the bank's distribution of loans reflects good dispersion among borrowers of different income levels and businesses of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is good. At the loan product level, examiners did not evaluate the bank's home improvement or multifamily loans because of low lending volume in this assessment area. The following table shows the bank's HMDA loan data by income level and product type for 2016 and 2017. The table also includes aggregate lending data for each year.

Borrower Distribution of HMDA Loans

Assessment Area: Kalispell

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2017					2016						2017					
		Bank		Families by Family Income		Count	Dollar		Count		Dollar		Count		Dollar			
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
HOME PURCHASE	Low	6	3.4%	\$746	1.8%	21.4%	10	5.6%	3.7%	\$863	2.0%	1.6%	6	3.4%	3.7%	\$746	1.8%	1.6%
	Moderate	22	12.4%	\$3,354	8.0%	20.5%	24	13.6%	16.0%	\$3,881	8.9%	10.5%	22	12.4%	13.7%	\$3,354	8.0%	9.1%
	Middle	43	24.3%	\$8,394	19.9%	23.4%	32	18.1%	23.7%	\$6,122	14.1%	20.8%	43	24.3%	21.9%	\$8,394	19.9%	19.1%
	Upper	98	55.4%	\$27,978	66.4%	34.7%	105	59.3%	38.0%	\$31,385	72.3%	48.7%	98	55.4%	41.7%	\$27,978	66.4%	51.7%
	Unknown	8	4.5%	\$1,676	4.0%	0.0%	6	3.4%	18.6%	\$1,132	2.6%	18.3%	8	4.5%	19.1%	\$1,676	4.0%	18.5%
	Total	177	100.0%	\$42,148	100.0%	100.0%	177	100.0%	100.0%	\$43,383	100.0%	100.0%	177	100.0%	100.0%	\$42,148	100.0%	100.0%
REFINANCE	Low	3	5.0%	\$197	1.5%	21.4%	5	4.0%	4.8%	\$412	1.5%	2.2%	3	5.0%	6.7%	\$197	1.5%	3.1%
	Moderate	6	10.0%	\$1,050	8.3%	20.5%	10	8.1%	12.1%	\$1,358	4.9%	8.0%	6	10.0%	15.5%	\$1,050	8.3%	10.4%
	Middle	15	25.0%	\$2,574	20.2%	23.4%	31	25.0%	18.7%	\$5,808	20.8%	15.8%	15	25.0%	19.4%	\$2,574	20.2%	16.7%
	Upper	33	55.0%	\$8,473	66.6%	34.7%	75	60.5%	39.5%	\$19,295	69.2%	48.5%	33	55.0%	38.4%	\$8,473	66.6%	49.3%
	Unknown	3	5.0%	\$423	3.3%	0.0%	3	2.4%	25.0%	\$1,020	3.7%	25.4%	3	5.0%	20.0%	\$423	3.3%	20.4%
	Total	60	100.0%	\$12,717	100.0%	100.0%	124	100.0%	100.0%	\$27,893	100.0%	100.0%	60	100.0%	100.0%	\$12,717	100.0%	100.0%
HOME IMPROVEMENT	Low	2	13.3%	\$12	0.9%	21.4%	0	0.0%	4.8%	\$0	0.0%	2.5%	2	13.3%	8.4%	\$12	0.9%	3.8%
	Moderate	5	33.3%	\$443	33.8%	20.5%	6	25.0%	18.7%	\$685	17.0%	11.0%	5	33.3%	17.8%	\$443	33.8%	11.7%
	Middle	4	26.7%	\$573	43.7%	23.4%	3	12.5%	25.5%	\$322	8.0%	23.0%	4	26.7%	24.0%	\$573	43.7%	20.1%
	Upper	4	26.7%	\$284	21.6%	34.7%	13	54.2%	48.6%	\$2,755	68.6%	61.7%	4	26.7%	47.6%	\$284	21.6%	62.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	2	8.3%	2.4%	\$256	6.4%	1.7%	0	0.0%	2.2%	\$0	0.0%	1.7%
	Total	15	100.0%	\$1,312	100.0%	100.0%	24	100.0%	100.0%	\$4,018	100.0%	100.0%	15	100.0%	100.0%	\$1,312	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	34.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	3	100.0%	100.0%	\$1,096	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	3	100.0%	100.0%	\$1,096	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	11	4.4%	\$955	1.7%	21.4%	15	4.6%	4.2%	\$1,275	1.7%	1.9%	11	4.4%	4.8%	\$955	1.7%	2.1%
	Moderate	33	13.1%	\$4,847	8.6%	20.5%	40	12.2%	14.4%	\$5,924	7.8%	9.4%	33	13.1%	14.4%	\$4,847	8.6%	9.2%
	Middle	62	24.6%	\$11,541	20.5%	23.4%	66	20.1%	21.6%	\$12,252	16.0%	18.6%	62	24.6%	21.1%	\$11,541	20.5%	17.7%
	Upper	135	53.6%	\$36,735	65.4%	34.7%	193	58.8%	39.1%	\$53,435	70.0%	48.7%	135	53.6%	40.8%	\$36,735	65.4%	49.4%
	Unknown	11	4.4%	\$2,099	3.7%	0.0%	14	4.3%	20.6%	\$3,504	4.6%	21.5%	11	4.4%	18.9%	\$2,099	3.7%	21.6%
	Total	252	100.0%	\$56,177	100.0%	100.0%	328	100.0%	100.0%	\$76,390	100.0%	100.0%	252	100.0%	100.0%	\$56,177	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016 and 2017, the bank’s level of lending to low-income and moderate-income borrowers was generally consistent with aggregate lenders but was below demographics. According to 2016 FFIEC adjusted census data, 23.4% of the families are low income and 18.4% are moderate income. This performance is reasonable, given the performance context discussed below.

Using the assumption that a borrower can afford a home for approximately three times their annual income, an individual with the highest income in the low-income bracket (\$30,249) could afford a \$90,747 house. This calculation is based on the 2017 FFIEC estimated median family income of \$60,500 for the assessment area. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$48,399), a borrower could afford a \$145,197 home. According to the 2017 FFIEC adjusted census data, the median housing value in the assessment area is \$221,035. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers. This information is consistent with information shared by community contacts, who indicated there is a lack of affordable housing in the area.

Bank management and community contacts indicated that home ownership can be difficult for low- and moderate-income people because of high home prices and high costs of homeownership in the assessment area. The Kalispell area is known as a recreational area where people own high-end second or vacation

homes, as well as retirement homes, which impacts housing supply and prices. Because of these factors, the ability of low- and moderate-income individuals to purchase homes is limited.

The bank makes use of flexible lending programs, including down payment and closing cost assistance programs that help low- and moderate-income borrowers afford homeownership. In this assessment area, the bank uses Fannie Mae HomeReady and MBOH down payment assistance programs. The bank's use of these programs enhances its performance in originating HMDA loans. For more information on these lending programs, refer to the Institution section at the beginning of this evaluation.

Consumer. The bank's consumer lending to low- and moderate-income borrowers is good. The following tables show the bank's consumer lending by product for 2016 and 2017. There is no aggregate lending data for consumer loans.

2016 Consumer Loan Distribution by Income Level of Borrower Kalispell Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	14	388	6.1	1.7	23.4
Moderate	26	1,716	11.4	7.5	18.4
Middle	42	2,933	18.4	12.7	21.5
Upper	135	17,433	59.2	75.7	36.8
Unknown	11	556	4.8	2.4	0.0
Total	228	23,026	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	45	415	14.1	5.8	23.6
Moderate	60	977	18.8	13.8	17.6
Middle	75	1,803	23.4	25.4	19.1
Upper	137	3,841	42.8	54.1	39.7
Unknown	3	59	0.9	0.8	0.0
Total	320	7,095	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	56	503	10.5	5.7	23.6
Moderate	105	1,136	19.6	12.8	17.6
Middle	132	2,076	24.7	23.5	19.1
Upper	231	4,962	43.2	56.1	39.7
Unknown	11	173	2.1	2.0	0.0
Total	535	8,850	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	16	110	25.4	17.9	23.6
Moderate	10	181	15.9	29.4	17.6
Middle	14	91	22.2	14.8	19.1
Upper	18	206	28.6	33.4	39.7
Unknown	5	28	7.9	4.5	0.0
Total	63	616	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	131	1,416	11.4	3.6	NA
Moderate	201	4,010	17.5	10.1	NA
Middle	263	6,903	22.9	17.4	NA
Upper	521	26,442	45.5	66.8	NA
Unknown	30	816	2.6	2.1	NA
Total	1,146	39,587	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower					
Kalispell Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	9	709	4.1	3.5	21.4
Moderate	33	1,681	15.0	8.3	20.5
Middle	43	3,857	19.5	19.0	23.4
Upper	130	13,738	59.1	67.5	34.7
Unknown	5	359	2.3	1.8	0.0
Total	220	20,344	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	34	369	12.8	6.9	25.3
Moderate	49	723	18.4	13.5	17.0
Middle	69	1,213	25.9	22.7	18.3
Upper	113	3,025	42.5	56.6	39.3
Unknown	1	18	0.4	0.3	0.0
Total	266	5,348	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	45	356	9.6	3.6	25.3
Moderate	81	1,126	17.2	11.3	17.0
Middle	86	1,330	18.3	13.3	18.3
Upper	253	7,053	53.7	70.5	39.3
Unknown	6	141	1.3	1.4	0.0
Total	471	10,006	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	17	79	20.7	11.1	25.3
Moderate	19	107	23.2	15.0	17.0
Middle	14	49	17.1	6.9	18.3
Upper	20	339	24.4	47.6	39.3
Unknown	12	138	14.6	19.4	0.0
Total	82	712	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	105	1,513	10.1	4.2	NA
Moderate	182	3,637	17.5	10.0	NA
Middle	212	6,449	20.4	17.7	NA
Upper	516	24,155	49.7	66.3	NA
Unknown	24	656	2.3	1.8	NA
Total	1,039	36,410	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016 and 2017, the bank's overall lending to low-income borrowers was below demographics, but lending to moderate-income borrowers was consistent with demographics. In both years, the bank's home equity lending to moderate-income borrowers was below demographics. For other unsecured loans in

2016, the bank’s lending to low-income borrowers was consistent with demographics. For other unsecured loans in 2017, the bank’s lending to moderate-income borrowers exceeded demographics.

The bank’s level of lending to low- and moderate-income borrowers was reasonable. The bank competes with credit unions, as well as community, regional, and national banks, for consumer loans. With respect to home equity loans, as previously mentioned in this evaluation, low- and moderate-income individuals may have difficulty purchasing a home; in addition, they may not have sufficient equity to take out such loans.

The bank also continues to offer small-dollar consumer loans. The bank originated 9.7% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 62.0% were to low- and moderate-income borrowers. These small-dollar loan originations show the bank’s willingness to meet the credit needs of the low- and moderate-income borrowers in the assessment area.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the bank’s small business loans by revenue and loan size for the evaluation period. The table also includes aggregate lending data for each year.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Kalispell

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison												
	Bank		Dollar		Total Businesses %	2016			2017			2017			2017			
	Count #	%	\$ (000s)	\$ %		Count Bank #	%	Dollar Agg %	Count Bank #	%	Dollar Agg %	Count Bank #	%	Dollar Agg %	Count Bank #	%	Dollar Agg %	
BUSINESS REVENUE	\$1million or Less	224	68.3%	\$13,226	53.2%	92.0%	200	65.1%	40.6%	\$14,738	51.9%	44.2%	224	68.3%	57.7%	\$13,226	53.2%	54.8%
	Over \$1 Million	79	24.1%	\$10,073	40.5%	7.0%	74	24.1%				79	24.1%					
	Total Rev. available	303	92.4%	\$23,299	93.7%	99.0%	274	89.2%				303	92.4%					
	Rev. Not Known	25	7.6%	\$1,565	6.3%	1.0%	33	10.7%				25	7.6%					
	Total	328	100.0%	\$24,864	100.0%	100.0%	307	100.0%				328	100.0%					
LOAN SIZE	\$100,000 or Less	273	83.2%	\$8,904	35.8%		236	76.9%	96.5%	\$7,474	26.3%	57.3%	273	83.2%	94.2%	\$8,904	35.8%	45.9%
	\$100,001 - \$250,000	30	9.1%	\$5,116	20.6%		35	11.4%	2.0%	\$5,912	20.8%	14.0%	30	9.1%	3.3%	\$5,116	20.6%	17.1%
	\$250,001 - \$1 Million	25	7.6%	\$10,844	43.6%		36	11.7%	1.5%	\$15,034	52.9%	28.7%	25	7.6%	2.5%	\$10,844	43.6%	37.1%
	Total	328	100.0%	\$24,864	100.0%		307	100.0%	100.0%	\$28,420	100.0%	100.0%	328	100.0%	100.0%	\$24,864	100.0%	100.0%
	LOAN SIZE Rev \$1 Mill or Less																	
\$100,000 or Less	192	85.7%	\$5,235	39.6%														
\$100,001 - \$250,000	19	8.5%	\$3,228	24.4%														
\$250,001 - \$1 Million	13	5.8%	\$4,763	36.0%														
Total	224	100.0%	\$13,226	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2017 FFIEC Census Data and 2017 D&B Information

For both years, the bank’s small business lending exceeds aggregate lenders, by number of loans, but is below demographics. According to 2016 D&B data, 92.7% of businesses in the assessment area have gross annual revenues of \$1 million or less. This figure went down slightly in 2017. The bank’s lending performance is excellent because it competes against many institutions, including national credit card lenders, and still performs favorably compared to aggregate reporters. The majority of the bank’s small business loans to small businesses were for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of all businesses, especially small businesses, since smaller organizations tend to request smaller-dollar loans.

Finally, the bank used flexible loan programs in this assessment area. Specifically, the bank participated in SBA lending programs, which provide flexibility to meet the needs of the small businesses in the area.

Geographic Distribution

Overall, the geographic distribution of the bank’s HMDA, consumer, and small business loans in the Kalispell assessment area is good. As of 2017, the assessment area had 6 moderate-, 24 middle-, and 2 upper-income census tracts. This is a change from 2016, when the assessment area had 1 low-, 7 moderate-, 21 middle-, and 3 upper-income census tracts. In 2017, the only low-income census tract was reclassified as moderate income.

As of 2017, middle-income tracts comprise 75.0% of total tracts. The bank has one branch in a moderate-income tract, six in middle-income tracts, and one in an upper-income tract. The bank originated loans in each census tract in the assessment area during the evaluation period. The bank’s lending does not reveal any unexplained gaps in lending.

Residential Real Estate. The geographic distribution and dispersion of the bank’s HMDA loans is good. At the loan product level, examiners did not evaluate the bank’s multifamily loans because of low loan volume in the assessment area. The following table shows the bank’s HMDA data by census tract income level and product type for 2016 and 2017. The table also includes aggregate lending data for both years.

Geographic Distribution of HMDA Loans
Assessment Area: Kalispell

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016						2017					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	1	0.6%	1.3%	\$115	0.3%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	31	17.5%	\$5,666	13.4%	17.2%	21	11.9%	18.4%	\$3,446	7.9%	14.2%	31	17.5%	14.1%	\$5,666	13.4%	10.5%
	Middle	125	70.6%	\$30,866	73.2%	74.4%	138	78.0%	71.2%	\$36,012	83.0%	74.9%	125	70.6%	73.0%	\$30,866	73.2%	75.2%
	Upper	21	11.9%	\$5,616	13.3%	8.4%	17	9.6%	9.0%	\$3,810	8.8%	10.2%	21	11.9%	12.9%	\$5,616	13.3%	14.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	177	100.0%	\$42,148	100.0%	100.0%	177	100.0%	100.0%	\$43,383	100.0%	100.0%	177	100.0%	100.0%	\$42,148	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	12	20.0%	\$1,863	14.6%	17.2%	14	11.3%	18.5%	\$3,001	10.8%	15.8%	12	20.0%	13.4%	\$1,863	14.6%	11.1%
	Middle	39	65.0%	\$8,963	70.5%	74.4%	92	74.2%	69.2%	\$20,360	73.0%	70.8%	39	65.0%	76.9%	\$8,963	70.5%	78.4%
	Upper	9	15.0%	\$1,891	14.9%	8.4%	18	14.5%	12.0%	\$4,532	16.2%	13.4%	9	15.0%	9.6%	\$1,891	14.9%	10.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	60	100.0%	\$12,717	100.0%	100.0%	124	100.0%	100.0%	\$27,893	100.0%	100.0%	60	100.0%	100.0%	\$12,717	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	20.0%	\$234	17.8%	17.2%	4	16.7%	15.9%	\$304	7.6%	13.2%	3	20.0%	10.7%	\$234	17.8%	6.5%
	Middle	11	73.3%	\$1,074	81.9%	74.4%	15	62.5%	71.7%	\$2,925	72.8%	74.2%	11	73.3%	77.3%	\$1,074	81.9%	81.9%
	Upper	1	6.7%	\$4	0.3%	8.4%	5	20.8%	11.6%	\$789	19.6%	12.2%	1	6.7%	12.0%	\$4	0.3%	11.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$1,312	100.0%	100.0%	24	100.0%	100.0%	\$4,018	100.0%	100.0%	15	100.0%	100.0%	\$1,312	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	42.9%	\$0	0.0%	11.2%	0	0.0%	23.5%	\$0	0.0%	33.2%
	Middle	0	0.0%	\$0	0.0%	74.9%	3	100.0%	57.1%	\$1,096	100.0%	88.8%	0	0.0%	64.7%	\$0	0.0%	39.8%
	Upper	0	0.0%	\$0	0.0%	7.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	27.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	3	100.0%	100.0%	\$1,096	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	1	0.3%	0.9%	\$115	0.2%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	46	18.3%	\$7,763	13.8%	17.2%	39	11.9%	18.4%	\$6,751	8.8%	14.8%	46	18.3%	13.7%	\$7,763	13.8%	11.4%
	Middle	175	69.4%	\$40,903	72.8%	74.4%	248	75.6%	70.3%	\$60,393	79.1%	73.3%	175	69.4%	74.4%	\$40,903	72.8%	75.0%
	Upper	31	12.3%	\$7,511	13.4%	8.4%	40	12.2%	10.4%	\$9,131	12.0%	11.5%	31	12.3%	11.8%	\$7,511	13.4%	13.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	252	100.0%	\$56,177	100.0%	100.0%	328	100.0%	100.0%	\$76,390	100.0%	100.0%	252	100.0%	100.0%	\$56,177	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016, the bank's overall HMDA lending was consistent with aggregate lenders and demographics in the low-income tract and below demographics and aggregate lenders in moderate-income tracts. According to 2016 census data, 1.9% of the families in the assessment area resided in low-income tracts and 22.3% resided in moderate-income tracts. In addition, 1.7% and 22.1% of owner-occupied units were located in low- and moderate-income tracts, respectively. The bank did not have a branch in the low-income tract, which includes the town of Libby. The low-income tract was approximately 68 miles from the bank's nearest branch. The moderate-income tracts were far from the bank's branches, sparsely populated, and contained large forests. In the low-income tract, 41.5% of housing units were rental properties. In addition, 10.3% of housing units in the low-income tract were vacant. In moderate-income tracts, 24.5% of the housing units were rental units, and 23.4% of the housing units were vacant. In addition, the bank operates in a competitive banking environment. Given these factors, the bank's lending in the low- and moderate-income tracts is reasonable.

In 2017, the bank's HMDA lending exceeded the performance of aggregate lenders in the moderate-income tracts and was consistent with demographics. According to 2017 census data, 17.2% of families reside in moderate-income tracts. Owner-occupied units account for 47.8% of the moderate-income housing units in moderate-income tracts, while 24.4% of the housing units are rental units and 27.8% are vacant, providing lenders with slightly more opportunity to lend in the moderate-income tracts. The bank's lending performance in moderate-income tracts in 2017 increased slightly from 2016, even with a reduction in the number of moderate-income census tracts.

In 2016 and 2017, the bank did not originate a HMDA loan in census tract 3.00 in Lincoln County, which was designated as moderate income in 2016 and as middle income in 2017. In addition, the bank did not originate a HMDA loan in census tract 5.00 in Lincoln County, which was designated as middle income in 2016 and as moderate income in 2017. The lack of lending in these tracts is reasonable. The bank does not have a branch in either tract, and those tracts are heavily forested and sparsely populated. In addition, a few banks operate in close proximity to both tracts in Libby, Montana. Despite these challenges and a competitive banking environment, the bank was still able to actively lend in the low- and moderate-income tracts in the assessment area.

Consumer. The geographic distribution and dispersion of the bank's consumer loans is good. The following two tables show the geographic distribution of the bank's 2016 and 2017 consumer loans.

2016 Consumer Loan Distribution by Income Level of Geography					
Kalispell Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	1.7
Moderate	31	2,924	13.6	12.7	22.1
Middle	180	18,122	78.9	78.7	67.1
Upper	17	1,980	7.5	8.6	9.1
Unknown	0	0	0.0	0.0	0.0
Total	228	23,026	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	12	164	3.8	2.3	2.2
Moderate	81	1,937	25.3	27.3	23.3
Middle	205	4,672	64.1	65.8	66.4
Upper	22	322	6.9	4.5	8.0
Unknown	0	0	0.0	0.0	0.0
Total	320	7,095	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	7	111	1.3	1.3	2.2
Moderate	99	1,532	18.5	17.3	23.3
Middle	380	6,290	71.0	71.1	66.4
Upper	49	917	9.2	10.4	8.0
Unknown	0	0	0.0	0.0	0.0
Total	535	8,850	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.2
Moderate	17	123	27.0	20.0	23.3
Middle	41	426	65.1	69.2	66.4
Upper	5	67	7.9	10.9	8.0
Unknown	0	0	0.0	0.0	0.0
Total	63	616	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	19	275	1.7	0.7	NA
Moderate	228	6,516	19.9	16.5	NA
Middle	806	29,510	70.3	74.5	NA
Upper	93	3,286	8.1	8.3	NA
Unknown	0	0	0.0	0.0	NA
Total	1,146	39,587	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Kalispell Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	30	2,513	13.6	12.4	17.2
Middle	157	15,394	71.4	75.7	74.4
Upper	33	2,437	15.0	12.0	8.4
Unknown	0	0	0.0	0.0	0.0
Total	220	20,344	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	56	1,081	21.1	20.2	18.6
Middle	194	3,881	72.9	72.6	74.0
Upper	16	386	6.0	7.2	7.3
Unknown	0	0	0.0	0.0	0.0
Total	266	5,348	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	94	1,503	20.0	15.0	18.6
Middle	331	6,713	70.3	67.1	74.0
Upper	46	1,790	9.8	17.9	7.3
Unknown	0	0	0.0	0.0	0.0
Total	471	10,006	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	26	287	31.7	40.3	18.6
Middle	53	365	64.6	51.3	74.0
Upper	3	60	3.7	8.4	7.3
Unknown	0	0	0.0	0.0	0.0
Total	82	712	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	206	5,384	19.8	14.8	NA
Middle	735	26,353	70.7	72.4	NA
Upper	98	4,673	9.4	12.8	NA
Unknown	0	0	0.0	0.0	NA
Total	1,039	36,410	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank’s overall level of lending in the low-income census tract was consistent with demographics. The bank’s lending performance in the moderate-income census tracts varied by product in 2016. The bank’s level of lending in the moderate-income census tracts was below demographics for home equity and other secured loans, above demographics for other unsecured loans, and consistent with demographics for motor vehicle loans. The percentage of households living in the low-income tract was low, while 23.3% of households lived in moderate-income tracts. In addition, 4.5% of low-income households and 31.7% of moderate-income households were below the poverty level. Many of these

households would likely not be able to afford a consumer loan. In addition, the cost of homeownership in the assessment area is high, which may limit homeownership, as well as home equity loan demand, by low- and moderate-income borrowers.

In 2017, the bank’s overall lending performance in the moderate-income census tracts was generally consistent with demographics; however, the bank’s home equity lending was below demographics and other unsecured lending exceeded demographics. The percentage of owner-occupied units in the moderate-income census tracts declined to 17.2% in 2017. The percentage of households in the moderate-income census tract declined to 18.6%. In addition, 25.7% of the households in the moderate-income tracts live below the poverty level. These households would likely not be able to afford a consumer loan and may not own homes as noted above.

The bank originated consumer loans in all census tracts in the assessment area during the evaluation period, including the low-income census tract in 2016 and in each moderate-income tract.

Small Business. The geographic distribution of small business loans is good. The following table shows the geographic distribution of the bank’s small business loans, as well as aggregate lending data for 2016 and 2017.

Geographic Distribution of Small Business Loans

Assessment Area: Kalispell 2017

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2017					2016					2017						
	Count		Bank		Small Businesses	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		#	%	Bank	Agg	\$ %	#	%	Bank	Agg	\$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	1.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	87	26.5%	\$4,520	18.2%	14.5%	42	13.7%	14.8%	\$3,249	11.4%	15.0%	87	26.5%	14.4%	\$4,520	18.2%	11.6%
Middle	202	61.6%	\$16,488	66.3%	77.3%	235	76.5%	60.8%	\$22,420	78.9%	65.0%	202	61.6%	72.5%	\$16,488	66.3%	77.0%
Upper	39	11.9%	\$3,856	15.5%	8.2%	30	9.8%	10.3%	\$2,751	9.7%	10.4%	39	11.9%	8.7%	\$3,856	15.5%	9.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	12.8%	\$0	0.0%	7.7%	0	0.0%	4.4%	\$0	0.0%	1.9%
Total	328	100.0%	\$24,864	100.0%	100.0%	307	100.0%	100.0%	\$28,420	100.0%	100.0%	328	100.0%	100.0%	\$24,864	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2017 D&B Information

In 2016, the bank did not make a small business loan in the low-income census tract; however, this lack of lending is consistent with demographics and aggregate lending data. According to 2016 D&B data, only 2.5% of small businesses were located in the low-income tract, and 17.4% were located in the moderate-income tracts. This lack of lending is also reasonable given that the bank’s nearest branch was over 60 miles away, and other financial institutions were located in this tract. The bank’s level of lending in moderate-income tracts in 2016 was consistent with aggregate lenders and below demographics. In 2017, the bank’s lending in moderate-income census tracts exceeded demographics and aggregate lenders.

In 2016, the bank originated a small business loan in every moderate-income tract in the assessment area. In 2017, the bank did not originate a small business loan in two moderate-income tracts (2.00 and 5.00) in Lincoln County. This performance is reasonable, given the following performance context. These tracts are heavily forested and sparsely populated. In addition, a few banks operate in Libby, Montana (which is in tract 2.00) and in close proximity to the other moderate-income census tract. In this assessment area, the bank had a 4.3% market share in 2016 and a 7.8% market share in 2017.

Community Development Lending

The bank makes a relatively high level of community development loans in the Kalispell assessment area. The bank originated a community development loan that helped to revitalize and stabilize a moderate-income census tract. The borrower employs numerous residents in the assessment area. This loan is very responsive to area needs, given that a community contact said this particular area faces many challenges, including high unemployment. The bank also originated a community development loan to a nonprofit organization that provides early intervention for at-risk youth. Based on the volume and responsiveness of community development lending and the competition for lending opportunities, the bank makes a relatively high level of community development loans in the Kalispell assessment area.

Community Development Lending in the Kalispell Assessment Area		
<i>Purpose</i>	#	\$
Community Service	1	15,150
Revitalize or Stabilize	1	10,000,000
Total	2	10,015,150

INVESTMENT TEST

Overall, the bank has an adequate level of qualified community development investments and donations, which demonstrates good responsiveness to the credit and community needs in the Kalispell assessment area.

The level of the bank’s qualified investments is adequate. The bank held seven prior-period investments totaling \$3.2 million, of which approximately \$1.9 million matured during the evaluation period. These matured investments funded community services for low- and moderate-income individuals in the assessment area. The remaining investments helped to revitalize and stabilize a moderate-income census tract, as well as distressed middle-income tracts, by providing financing to local school districts.

The bank made an adequate level of qualified investments in the form of donations, as shown in the table at right. The majority of donations focus on community services targeted to low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services, such as emergency shelter and food, to individuals in need, including at-risk children. The bank also made one donation to an organization that supports affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the Kalispell Assessment Area		
<i>First Interstate Bank</i>	#	\$
Community Service	13	9,380
Total	13	9,380
<i>Foundation</i>	#	\$
Affordable Housing	1	280
Community Service	43	12,326
Total	44	12,606

SERVICE TEST

The bank’s retail service activities are readily accessible to residents and businesses throughout the assessment area. Hours and services do not vary in a way that inconveniences particular individual or areas. The bank provides an adequate level of community development services in the assessment area.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different income levels. The bank operates eight full-service branches in the communities of Eureka, Big Fork, Kalispell (three), Lakeside, Polson, and Whitefish, as well as a stand-alone drive-up

facility in Kalispell. The bank purchased two branches (Lakeside and Big Fork) from another institution on August 12, 2016, and subsequently closed one existing branch in Big Fork on August 16, 2016.

The bank’s retail services and hours do not vary in a way that inconveniences certain individuals or areas. The bank’s Eureka branch is located in a moderate-income census tract. Six branches are located in middle-income census tracts, reflecting the population density in the assessment area, and one is located in an upper-income census tract. All branches have ATMs, and most have drive-up facilities with extended hours. Three branches have Saturday hours. The bank also operates two stand-alone cash-dispensing-only ATMs in this assessment area.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. The bank offers reasonable service hours and provides reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS

Assessment Area: Kalispell

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	Open	Closed	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	11.1%	0	0	1	1	0	Total	1	9.1%	0	0.0%	0	0	1	12.5%	0	0	6	18.8%	18.6%	14.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	7	77.8%	2	1	5	3	3	Total	9	81.8%	3	100.0%	2	0	6	75.0%	0	1	24	75.0%	74.0%	77.1%
DTO	1		0	0				SA	2		0		0	0	2		0	0				
Upper	1	11.1%	0	0	1	1	0	Total	1	9.1%	0	0.0%	0	0	1	12.5%	0	0	2	6.3%	7.3%	8.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	9	100.0%	2	1	7	5	3	Total	11	100.0%	3	100.0%	2	0	8	100.0%	0	1	32	100.0%	100.0%	100.0%
DTO	1		0	0				SA	2		0		0	0	2		0	0				

2016 FFIEC Census Data, 2016 D&B Info, and 2015 ACS Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provided an adequate level of community development services in the Kalispell assessment area. Twelve bank employees provided 17 community development services during the evaluation period for 12 different organizations. The bank’s community development service activities mainly focused on nonprofit organizations that provided essential services to low- and moderate-income individuals, such as health care and children’s programs, as well as supported economic opportunities for small businesses. During the evaluation period, bank employees served as board members, committee and team members, and presenters for these organizations.

Community Development Services in the Kalispell Assessment Area	
<i>Purpose</i>	#
Community Services	12
Economic Development	5
Total	17

METROPOLITAN AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREAT FALLS, MONTANA, MSA 24500 ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Great Falls MSA assessment area. They determined that the bank’s lending and investment performance in this assessment area is consistent with the performance in the full-scope MSA assessment area. They determined that the bank’s service performance in this assessment area is below the rating in the full-scope MSA assessment area due to a lack of new investment securities. Examiners did not include the bank’s small farm loans in the analysis because of low lending volume in this assessment area.

This assessment area consists of Cascade County and is contiguous with the Helena assessment area. In 2016, the assessment area included 5 moderate-income, 14 middle-income, and 3 upper-income census tracts. The income classifications for some tracts changed in 2017, as shown in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 82,090.¹²

The bank operates three full-service branches in the assessment area. All three are in Great Falls and have cash-dispensing-only ATMs. Two of the branches are located in moderate-income tracts and one is located in an upper-income tract. In 2016, the bank closed a stand-alone drive-up facility in an upper-income census tract. The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Great Falls Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	19.8
Moderate Income	5	22.7	16.2	18.5
Middle Income	13	59.1	56.7	22.1
Upper Income	4	18.2	27.1	39.6
Total	22	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.¹³

Lending Activity in the Great Falls Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	176	143	319
Small Farm	17	22	39
HMDA	345	241	586
Consumer	366	299	665
Total	904	705	1,609

¹² The FFIEC adjusted census data is based on the 2010 U.S. Census data and the American Community Survey five-year estimate data; it also reflects changes from the 2013 OMB-revised metropolitan statistical area delineations.

¹³ For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

By number, the Great Falls MSA assessment area accounts for 3.5% of the bank’s overall lending during the evaluation period and 6.7% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 4th out of 45 institutions reporting small business and small farm loans in the assessment area, and in 2016 it ranked 5th. The bank extended 10.0% of small farm loans reported by aggregate lenders in the assessment area in 2017. For HMDA loans, the bank ranked 2nd in 2016 and 2017. The bank accounted for 7.9% of aggregate HMDA lending in 2017 and 10.6% in 2016 in the assessment area.

The bank’s community development loans are noteworthy for this assessment area. The bank made \$9.5 million in community development loans that address affordable housing and economic development initiatives.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MISSOULA, MONTANA, MSA 33540 ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Missoula MSA assessment area. They determined that the bank’s lending and investment performance in this assessment area is consistent with its performance in the full-scope MSA assessment area. They determined that the bank’s service performance in this assessment area is below the full-scope MSA assessment area rating due to limited community development services. Examiners did not include the bank’s small farm lending in the analysis because of low lending volume in this assessment area.

This assessment area consists of Missoula County, which comprises the Missoula, Montana MSA. The assessment area is located in west-central Montana and is contiguous with the Kalispell and Hamilton assessment areas. In 2016, the assessment area included 4 moderate-, 11 middle-, and 5 upper-income tracts. The income classifications for some tracts changed in 2017, as shown in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 109,299.

The bank operated three full-service branches with deposit-taking ATMs during the evaluation period – one each in a low-, moderate-, and middle-income census tract. The branches have weekend and extended hours. In March 2016, the bank closed one full-service branch with a deposit-taking ATM that was located in a middle-income tract. The bank also closed a deposit-taking ATM that was located at a mall in a moderate-income tract but still maintains a cash-dispensing-only ATM at that location. The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Missoula Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	1	5.0	0.7	21.1
Moderate Income	3	15.0	14.2	18.2
Middle Income	13	65.0	65.3	20.8
Upper Income	3	15.0	19.8	39.9
Total	20	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Missoula Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	323	275	598
Small Farm	6	4	10
HMDA	355	223	578
Consumer	668	600	1,268
Total	1,352	1,102	2,454

By number, the Missoula MSA assessment area accounts for 5.3% of overall lending during the evaluation period and 10.2% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 4th among the 65 institutions reporting small business and small farm loans in the assessment area. The bank extended 8.0% of small business and small farm loans in the assessment area. The bank also ranked 4th in small business and small farm lending in 2016. For HMDA loans, the bank ranked 6th and 3rd in 2016 and 2017, respectively. The bank accounted for 5.9% of the HMDA lending in 2017 and 8.6% in 2016 in the assessment area.

The bank’s community development loans are noteworthy for this assessment area and rank first in the dollar amount among all of the bank’s assessment areas. The bank made \$23.5 million in community development loans that address affordable housing and economic development initiatives as well as a revitalization/stabilization effort.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank’s community development lending and qualified investments for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review Montana MSA Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Great Falls MSA	Consistent	Below	Consistent
Missoula MSA	Consistent	Consistent	Below

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BOZEMAN, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Bozeman assessment area. They determined that the bank’s investment performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. They determined that the bank’s lending and service performance in this assessment area exceed the performance in the full-scope nonmetropolitan assessment area because of the extensive use of flexible loan programs and level of community development services. Examiners did not include the bank’s small farm lending in the analysis because of low lending volume in this assessment area.

This assessment area consists of Gallatin County and most of Park County in western Montana. The assessment area is between the Ennis, Montana, assessment area (to the west) and the Absarokee/ Columbus, Montana, assessment area (to the east). In 2016, the assessment area included 1 low-income, 4 moderate-income, 11 middle-income, and 11 upper-income census tracts. The income classifications for some tracts changed in 2017, as shown in the table below. None of the tracts were considered distressed or underserved during the evaluation period. According to 2017 FFIEC adjusted census data, the population of the assessment area is 111,031.¹⁴

The bank operated eight full-service offices with cash-dispensing-only ATMs and two stand-alone cash-dispensing-only ATMs. During the evaluation period, these offices were located in the communities of Bozeman (four), Belgrade (two), Gardiner (one) and Livingston (one). The bank has an office in the low-income tract and one in a moderate-income tract. Five offices are located in middle-income tracts, and one is in an upper-income tract. The bank also maintained two stand-alone cash-dispensing ATMs until it closed one in Bozeman in October 2017. The bank acquired two new offices in Belgrade in this assessment area based on the 2016 acquisition of Flathead Bank of Bigfork. The bank kept two of its Belgrade offices open and closed the third.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Bozeman Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	1	3.7	1.4	13.9
Moderate Income	2	7.4	3.7	16.4
Middle Income	12	44.4	39.8	20.4
Upper Income	12	44.4	55.1	49.3
Total	27	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.¹⁵

¹⁴ The FFIEC adjusted census data is based on the 2010 U. S. Census data and the American Community Survey five-year estimate data; it also reflects changes from the 2016 OMB-revised MSA delineations.

¹⁵ For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

Lending Activity in the Bozeman Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	500	425	925
Small Farm	23	40	63
HMDA	533	444	977
Consumer	963	966	1,929
Total	2,019	1,875	3,894

By number, the Bozeman assessment area accounts for 8.4% of the bank’s overall lending during the evaluation period and 16.2% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 4th among 67 aggregate reporters in the assessment area and extended 9.3% of small business loans reported in the assessment area. The bank also ranked 3rd in small business lending in 2016. For HMDA loans, the bank ranked 2nd in 2016 and 3rd in 2017. The bank accounted for 10.2% of the HMDA lending in 2016 and 8.9% in 2017 in this assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HAMILTON, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Hamilton assessment area. They determined that the bank’s lending, investment, and service performance in this assessment area is consistent with its performance in the full-scope nonmetropolitan assessment area. Examiners did not evaluate the bank’s small farm lending because of low lending volume in this assessment area.

This assessment area consists of Ravalli County in west-central Montana. The assessment area is contiguous with and south of the Missoula MSA assessment area. In 2016, the assessment area included 1 moderate-income, 8 middle-income, and 1 upper-income census tracts. The income classifications for some tracts changed in 2017, as shown in the table below. None of the census tracts were considered distressed or underserved during the evaluation period. According to 2017 FFIEC adjusted census data, the population of the assessment area is 40,823.

The bank operates one full-service branch in the assessment area that has a cash-dispensing-only ATM and a drive-up facility with extended hours. The branch is located in a moderate-income census tract.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Hamilton Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	25.1
Moderate Income	4	40.0	41.3	18.4
Middle Income	5	50.0	48.7	21.6
Upper Income	1	10.0	10.0	35.0
Total	10	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Hamilton Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	56	37	93
Small Farm	1	0	1
HMDA	84	64	148
Consumer	203	167	370
Total	344	268	612

By number, the Hamilton assessment area accounts for 1.3% of the bank’s overall lending during the evaluation period and 2.6% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 9th among 38 aggregate reporters in the assessment area. The bank extended 3.5% of small farm and small business loans reported in the assessment area. The bank also ranked 6th for small business and small farm lending in 2016. For HMDA loans, the bank ranked 6th in 2016 and 8th in 2017. The bank accounted for 4.3% of the HMDA lending in 2017 and 5.0% in 2016 in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HARDIN, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Hardin assessment area. They determined that the bank’s lending performance in this assessment area is consistent with its performance in the full-scope nonmetropolitan assessment area. They determined that the bank’s investment and service performance in this assessment area exceed the performance in the full-scope nonmetropolitan assessment area because of the level of community development donations and services.

The assessment area consists of Big Horn, Custer, and Rosebud counties in central Montana. It includes a large portion of the Crow and Northern Cheyenne Indian Reservations. The assessment area is contiguous with the Billings MSA assessment area. In 2016, the assessment area included five moderate-income, eight middle-income, and two upper-income census tracts. The income classifications for some tracts changed in 2017, as shown in the table below. In 2016, four census tracts were considered distressed and six were considered underserved. In 2017, two census tracts were considered distressed and seven tracts were considered underserved. According to 2017 FFIEC adjusted census data, the population of the assessment area is 34,438.

The bank operated five full-service branches with ATMs in the communities of Hardin (one), Colstrip (one), Lame Deer (one), and Miles City (two). A drive-up facility in Hardin has extended hours. One branch is located in a moderate-income tract, two branches and the drive-up facility are in middle-income tracts, and one branch is in an upper-income tract.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Hardin Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	24.0
Moderate Income	4	26.7	30.2	16.9
Middle Income	9	60.0	12.4	19.6
Upper Income	2	13.3	6.9	39.5
Total	15	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Hardin Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	158	133	291
Small Farm	161	175	336
HMDA	136	132	268
Consumer	1,398	1,014	2,412
Total	1,853	1,454	3,307

By number, the Hardin assessment area accounts for 7.1% of the bank’s overall lending during the evaluation period and 13.8% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 1st among 37 aggregate reporters in the assessment area. It extended 32.7% of small farm and small business loans reported in the assessment area. The bank also ranked 1st in small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st in 2016 and 2017 with 26.3% and 29.5% of aggregate loans, respectively.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HELENA, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Helena micropolitan assessment area. They determined that the bank’s lending performance in this assessment area is consistent with its performance in the full-scope assessment areas. Examiners did not evaluate the bank’s small farm lending because of low lending volume in this assessment area.

This assessment area consists of Lewis and Clark County. The assessment area is contiguous with the Kalispell and Great Falls MSA assessment areas. In 2016, the assessment area included one moderate-income, seven middle-income, and six upper-income census tracts. The income classifications for the census tracts changed in 2017, as shown in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 63,395.

In this assessment area, the bank operated five full-service branches with drive-up facilities and ATMs. All five offices were in Helena. The bank closed a branch in the first quarter of 2016. Three of the branches are in middle-income census tracts and two branches are in upper-income census tracts.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Helena Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	14.8
Moderate Income	1	7.1	3.4	14.5
Middle Income	8	57.1	52.8	22.1
Upper Income	5	35.7	43.8	48.6
Unknown-income	0	0.0	0.0	0.0
Total	14	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Helena Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	97	133	230
Small Farm	3	5	8
HMDA	230	206	436
Consumer	391	320	711
Total	721	664	1,385

By number, the Helena assessment area accounts for 3.0% of the bank’s overall lending during the evaluation period and 5.8% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 5th out of 46 institutions reporting small business and small farm loans in the assessment area. It extended 8.1% of small farm and small business loans reported in the assessment area. The bank ranked 7th for small business and small farm lending in 2016. For HMDA loans, the bank ranked 3rd in 2016 and 2nd in 2017. The bank accounted for 8.9% of the HMDA lending in 2017 and 8.9% in 2016 in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ABSAROKEE/COLUMBUS, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Absarokee/Columbus assessment area. They determined that the bank’s investment and service performance in this assessment area is consistent with its performance in the full-scope nonmetropolitan assessment area. They determined that the bank’s lending performance in this assessment area is below the full-scope nonmetropolitan assessment area rating, due to a lack of community development loans. Examiners did not evaluate the bank’s small business, small farm, or HMDA lending because of low lending volume in this assessment area.

This assessment area consists of Stillwater County in south-central Montana, close to the Wyoming border. The assessment area is contiguous with the Billings MSA assessment area. The assessment area includes three census tracts; the income classifications did not change during the evaluation period. Two middle-income tracts were considered underserved during the evaluation period. According to 2017 FFIEC adjusted census data, the population of the assessment area is 9,288.

The bank operates two full-service branches in the communities of Absarokee and Columbus; both branches have ATMs. A stand-alone drive-up facility in Absarokee has a deposit-taking ATM; the Columbus branch has a drive-up facility with weekend hours. All branches and drive-up facilities are located in middle-income tracts. For both years of the evaluation period, two census tracts in Stillwater County were designated as underserved. Finally, the bank partners with third-party operators to provide additional surcharge-free nonproprietary cash-dispensing-only ATMs in the assessment area: two are in Absarokee and one is in Columbus.

The following table provides information regarding the demographic characteristics of the assessment area based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Absarokee/Columbus Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	13.9
Moderate Income	0	0.0	0.0	18.1
Middle Income	2	66.7	68.5	19.0
Upper Income	1	33.3	31.5	48.9
Total	3	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Absarokee/Columbus Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	20	22	42
Small Farm	26	35	61
HMDA	46	39	85
Consumer	179	133	312
Total	271	229	500

By number, the Absarokee/Columbus assessment area accounted for 1.1% of the bank’s overall lending during the evaluation period and 2.1% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 1st among 22 aggregate reporters in the assessment area. The bank extended 19.1% of small farm and small business loans reported in the assessment area for 2017. The bank ranked 3rd for small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st among approximately 60 HMDA reporters in 2016 and 2017. The bank accounted for 13.8% of HMDA lending in 2017 and 12.6% in 2016 in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CUT BANK, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Cut Bank assessment area. They determined that the bank’s investment performance in this assessment area is consistent with its performance in the full-scope nonmetropolitan assessment area. They determined that the bank’s lending and service performance is below the bank’s performance in the full-scope nonmetropolitan assessment area due to limited or no community development activity, as well as no use of flexible loans programs. Examiners did not evaluate the bank’s small business, small farm, or HMDA lending because of low lending volume in this assessment area.

The assessment area consists of all but one tract in Glacier County; it is in northern Montana and borders on Canada. It contains most of the Blackfeet Indian Reservation. The assessment area is separated from the Kalispell assessment area by a census tract that consists of Glacier National Park. The income classifications for the census tracts are shown in the following table. The middle-income tracts are considered distressed and underserved in 2017. According to 2017 FFIEC adjusted census data, the population of the assessment area is 13,611.

The bank began operations in this assessment area in mid-August 2016 after acquiring Flathead Bank of Bigfork, Montana. The bank operates one full-service branch in Cut Bank with an ATM and a drive-up facility that has extended hours. The branch is located in a distressed and underserved middle-income census tract.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Cut Bank Assessment Area				
Income Category	Tract Distribution		Percentage of Families by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	33.3	37.3	39.5
Moderate Income	0	0.0	0.0	17.6
Middle Income	2	66.7	62.7	14.7
Upper Income	0	0.0	0.0	28.2
Total	3	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Cut Bank Assessment Area			
Loan Type	August 12, 2016, to December 31, 2016	2017	Total
Small Business	16	39	55
Small Farm	22	45	67
HMDA	6	17	23
Consumer	115	138	253
Total	159	239	398

By number, the Cut Bank assessment area accounts for 0.9% of the bank’s overall lending during the evaluation period and 1.7% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 2nd among 22 aggregate reporters in the assessment area. It extended 27.0% of small farm and small business loans reported in the assessment area. For HMDA loans, in 2017 the bank ranked 2nd and accounted for 15.5% of HMDA lending in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ENNIS, MONTANA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Ennis assessment area. They determined that the bank’s investment performance in this assessment area is consistent with its performance in the full-scope nonmetropolitan assessment area. They determined that the bank’s lending and service performance is below the bank’s performance in the full-scope nonmetropolitan assessment area due to limited or no community development activity, as well as no use of flexible loans programs. This performance does not change the conclusion for the nonmetropolitan portions of the state. Examiners did not evaluate the bank’s small farm, small business, or HMDA lending because of low lending volume in this assessment area.

The assessment area consists of Madison County in southwestern Montana and is contiguous with the Bozeman assessment area. Madison County includes three middle-income census tracts, which were all classified as underserved in 2017. According to 2017 FFIEC adjusted census data, the population of the assessment area is 7,767.

The bank began operations in this assessment area in August 2016 after acquiring the Flathead Bank of Bigfork. It operates one full-service branch with an ATM and drive-up facility in Ennis. The drive-up has extended hours. The branch is located in an underserved middle-income census tract.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Ennis Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	18.7
Moderate Income	0	0.0	0.0	18.8
Middle Income	3	100.0	100.0	23.0
Upper Income	0	0.0	0.0	39.4
Total	3	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Ennis Assessment Area			
<i>Loan Type</i>	<i>August 12, 2016, to December 31, 2016</i>	<i>2017</i>	<i>Total</i>
Small Business	11	21	32
Small Farm	2	3	5
HMDA	12	21	33
Consumer	67	69	136
Total	92	114	206

By number, the Ennis assessment area accounts for 0.4% of the bank’s overall lending during the evaluation period and 0.9% of the bank’s lending activity in the Montana assessment areas. In 2017, the bank ranked 4th among 27 aggregate reporters in the assessment area. It extended 7.8% of small farm and small business loans reported in the assessment area. For HMDA loans, the bank ranked 5th in 2017 and accounted for 5.2% of the HMDA lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank’s community development lending and qualified investments for each assessment area. The Montana state section of the report also shows qualified investments in the form of donations and community development services for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Montana Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Bozeman	Exceeds	Consistent	Exceeds
Hamilton	Consistent	Consistent	Consistent
Hardin	Consistent	Exceeds	Exceeds
Helena	Consistent	Consistent	Consistent
Absarokee/Columbus	Below	Consistent	Consistent
Cut Bank	Below	Consistent	Below
Ennis	Below	Consistent	Below

WYOMING

CRA RATING FOR Wyoming: Satisfactory
The Lending Test is rated: Outstanding
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the Wyoming assessment areas shows excellent responsiveness to local credit needs.
- The bank's lending to farms and businesses of different sizes and to low- and moderate-income borrowers is excellent.
- The bank's overall distribution of loans throughout the assessment areas is excellent.
- The bank is a leading community development lender in its Wyoming assessment areas.
- The bank makes extensive use of flexible loan programs in its Wyoming branches.
- By number and dollar amount, the bank has an adequate level of qualified investments, which exhibits adequate responsiveness to credit and community development needs.
- Bank retail services are readily accessible to businesses, farms, and residents throughout the assessment areas. The bank also provides a relatively high level of community development services in its Wyoming assessment areas.

SCOPE OF EVALUATION

The scope of the CRA evaluation for Wyoming is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed full-scope reviews for the Cheyenne MSA and the Riverton assessment areas. In general, examiners gave greater weight to the Cheyenne MSA assessment area, based on the bank's lending activity.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of lending, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Casper MSA, Jackson, Laramie, and Sheridan assessment areas in Wyoming. Examiners evaluated whether the bank's performance in the limited scope assessment areas was consistent with its performance in the full-scope assessment areas. The limited-scope MSA assessment area is compared to the metropolitan full-scope assessment area. Similarly, nonmetropolitan limited-scope assessment areas are compared to the nonmetropolitan full-scope assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WYOMING

Assessment Area Information. During the evaluation period, the bank had six assessment areas in Wyoming. The bank has not changed its Wyoming assessment areas since the previous evaluation.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank had \$2.4 billion in deposits in its Wyoming assessment areas, which is 32.7% of total bank deposits. According to the same report, the bank ranked 2nd among the 46 FDIC-insured institutions in Wyoming, with 15.5% of the state's deposits. The bank operates in highly competitive assessment areas with many regional and several

national banks. A large national bank holds 18.0% of the state's deposits. The bank and the three other largest deposit holders account for 46.1% of the deposits in the state.

Based on 2017 FFIEC adjusted census data, the Wyoming assessment areas include 78 census tracts: 3 low-, 12 moderate-, 49 middle-, 13 upper-, and 1 unknown-income.¹⁶ For 2017, 7 of the nonmetropolitan middle-income census tracts, all located in the Laramie assessment area, are classified as distressed. The unknown-income tract is a special land-use tract located in the Cheyenne MSA assessment area.¹⁷ The majority of the Wind River Indian Reservation is located in the Riverton assessment area.

Population. According to 2017 FFIEC adjusted census data, the total population of the assessment areas in Wyoming is 362,424 and the population of Wyoming is 579,679. The bank's assessment areas in Wyoming include 62.5% of the state's population. The data also shows that 77.0% of the population in the assessment areas reside in middle- and upper-income census tracts and that 11.1% of the households are below the poverty level.

General Economic and Housing Information. Bank management and community contacts stated that in general, economic conditions in Wyoming have not fully rebounded since the recession. In 2016 and 2017, the state's annual average unemployment rate was 5.3% and 4.2%, respectively. These rates were slightly above the national rate in 2016 and slightly below the national rate in 2017.

Agriculture is one of the largest industries in Wyoming and a predominant economic driver in many of the bank's assessment areas. According to the 2017 Census of Agriculture,¹⁸ 77.3% of Wyoming farms are family owned and operated. The average farm size is 2,430 acres. Producers in Wyoming grow barley, winter wheat, hay, and edible beans. In addition, many ranchers in Wyoming raise livestock; the majority of ranchers raise cattle.

Small businesses also play a significant role in Wyoming's diverse economy. According to the SBA, small businesses employed 62.6% of the private workforce in the state in 2015. Most small businesses have fewer than 100 employees. Construction, retail, and technical services are among the primary nonagricultural industries.

The housing market in Wyoming varies by community. In some markets, the housing supply is tight or in need of rehabilitation. It can be difficult for some markets to attract developers due to high construction costs, especially when it comes to building affordable housing. Finally, some communities do not support residential real estate development efforts and land is not available.

According to 2017 FFIEC census data, 57.4% of housing in the Wyoming assessment areas was owner-occupied, 29.2% was rental, and 13.4% was vacant. The median housing value in the Wyoming assessment areas was \$202,009, with the lowest value in Natrona County at \$185,600 and the highest value in Teton County at \$689,000. The median age of housing stock in the Wyoming assessment areas was 43 years old, with the lowest median age of housing stock in Campbell County at 24 years old and the highest median age of housing stock in the Casper MSA at 42 years.

Wyoming has numerous financial institutions. Many large national and regional banks, as well as credit unions, operate throughout the state. Accordingly, competition for deposits, loans, and community development activities is strong in various regions and assessment areas.

¹⁶ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

¹⁷ See the Cheyenne MSA section for more information.

¹⁸ Census of Agriculture data is compiled by the USDA National Agricultural Statistics Service.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING

Examiners based the bank's Wyoming evaluation on full-scope reviews of the Cheyenne MSA and Riverton assessment areas and limited-scope reviews of the remaining Wyoming assessment areas. A detailed discussion of the bank's performance in the full-scope assessment areas and a shorter discussion of the limited-review assessment areas follow this section. For the limited-scope assessment areas, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for Wyoming is satisfactory based on the bank's performance under the Lending, Investment, and Service tests.

The Lending Test rating is outstanding. The bank's lending activity reflects excellent responsiveness to credit needs throughout the Wyoming assessment areas. The bank's distribution of loans to borrowers of different income levels and to businesses and farms of different sizes is excellent. The geographic distribution of loans reflects excellent penetration throughout the assessment areas. The bank is a leader in making community development loans. Finally, the bank uses flexible loan programs extensively in many of its assessment areas.

The Investment Test rating is low satisfactory. The bank made an adequate level of qualified investments by number and dollar amount, which showed adequate responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. The bank's delivery systems are readily accessible to all portions of the Wyoming assessment areas. The bank has made some changes to branch and ATM locations during the evaluation period; however, these changes did not adversely affect the availability of its delivery systems. The bank provides a relatively high level of community development services.

LENDING TEST

The Lending Test rating is outstanding for Wyoming.

Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its Wyoming assessment areas. The following table shows the bank's lending in its Wyoming assessment areas by product type for the two-year evaluation period.

Summary of Lending Activity in the Wyoming Assessment Areas				
<i>Loan Type</i>	2016			
	#	%	\$(000)	%
HMDA Home Purchase	1,262	60.6%	269,588	62.5%
HMDA Refinancing	655	31.4%	139,611	32.3%
HMDA Home Improvement	158	7.6%	17,050	4.0%
HMDA Multifamily	9	0.4%	5,367	1.2%
Total HMDA Related	2,084	29.5%	431,616	64.9%
Total Small Business	1,201	17.0%	104,298	15.7%
Total Small Farm	260	3.7%	16,095	2.4%
Home Equity	480	13.6%	44,700	39.6%
Motor Vehicle	1,564	44.3%	41,059	36.4%
Other - Secured	1,156	32.8%	23,942	21.2%
Other - Unsecured	328	9.3%	3,078	2.7%
Total Consumer Related	3,528	49.9%	112,779	17.0%
Total Loans	7,073	100.0%	664,788	100.0%
2017				
<i>Loan Type</i>	2017			
	#	%	\$(000)	%
HMDA Home Purchase	1,280	71.3%	266,808	73.6%
HMDA Refinancing	353	19.7%	75,591	20.9%
HMDA Home Improvement	150	8.4%	14,758	4.1%
HMDA Multifamily	11	0.6%	5,317	1.5%
Total HMDA Related	1,794	28.5%	362,474	62.0%
Total Small Business	1,204	19.1%	102,068	17.5%
Total Small Farm	255	4.0%	19,758	3.4%
Home Equity	456	15.0%	44,354	44.2%
Motor Vehicle	1,251	41.0%	32,407	32.3%
Other - Secured	963	31.6%	20,040	20.0%
Other - Unsecured	379	12.4%	3,463	3.5%
Total Consumer Related	3,049	48.4%	100,264	17.2%
Total Loans	6,302	100.0%	584,564	100.0%
GRAND TOTALS				
2016 - 2017				
Total HMDA	3,878	29.0%	794,090	63.6%
Total Small Business	2,405	18.0%	206,366	16.5%
Total Small Farm	515	3.9%	35,853	2.9%
Total Consumer	6,577	49.2%	213,043	17.1%
Total All Loans	13,375	100.0%	1,249,352	100.0%

The Wyoming assessment areas account for 28.7% by number and 35.1% by amount of the bank's lending activity during the evaluation period. Small business, small farm and consumer lending remained stable with slight decreases both years while HMDA loans decreased in the refinance category. Bank management indicated the refinance activity has stalled due to increased interest rates.

In all but one of the areas served, the bank is typically among the leading lenders for small business, small farm, and HMDA loans. The bank was among the top two lenders in many assessment areas and among the top 10 lenders in the Cheyenne MSA for both years. The bank makes extensive use of flexible and innovative programs, particularly for home mortgage loans to low- and moderate-income borrowers.

Refer to the Innovative and Flexible Lending Practices described previously in the Institution section for specific program information.

Borrower and Geographic Distributions

Overall, the bank’s distribution of loans among borrowers of different income levels and businesses and farms of different sizes is excellent. The bank extends loans to low- and moderate-income borrowers and to small businesses and small farms throughout the assessment areas. In addition, the geographic distribution of loans is excellent. The bank extends loans in all census tracts, including all low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests section for the Cheyenne MSA and Riverton assessment areas. The tables in Appendix D show the borrower and geographic distributions of the bank’s loans, demographic characteristics, and aggregate lending data for the limited-scope assessment areas.

Community Development Loans

The bank is a leader in making community development loans in the Wyoming assessment areas. As shown in the table at right, the bank originated or renewed 24 community development loans totaling approximately \$20.2 million. Community development loans were made in all assessment areas; however there were concentrations in four of the six assessment areas. By number and dollar amounts, respectively, the bank’s concentrations were:

Wyoming Community Development Loans		
<i>Purpose</i>	#	\$
Affordable Housing	10	3,004,377
Community Services	6	3,815,250
Economic Development	2	3,205,887
Revitalize and Stabilize	4	4,315,243
Revitalize and Stabilize Underserved and Distressed	2	5,888,750
Total	24	20,229,507

37.5% and 43.0% in the Laramie assessment area, 16.7% and 29.1% in the Casper MSA assessment area, 12.5% and 18.1% in the Riverton assessment area, and 20.8% and 6.5% in the Sheridan assessment area.

The majority of the bank’s community development loan dollars (50.4%) supported a variety of revitalization and stabilization efforts. The bank made the highest number of loans to support efforts to provide affordable housing to low- and moderate-income individuals. Community development lending also provided funding for community services and supported economic development efforts in the assessment areas. The level of community development lending is responsive to the needs of the assessment areas. The bank made significant loans to help revitalize and stabilize low- and moderate-income, distressed, or underserved areas in a few assessment areas. Some of these revitalization efforts also provided affordable housing benefits. There is a critical need for affordable housing for low- and moderate-income residents across the state of Wyoming. The bank originated loans to purchase, construct, refinance, or rehabilitate affordable housing projects in the Cheyenne MSA, Casper MSA, Laramie, Riverton, and Sheridan assessment areas.

Because the bank’s community development lending activities were responsive to community development needs in its Wyoming assessment areas, examiners can also consider any qualified community development loans benefiting geographies outside the bank’s assessment areas. The bank originated one loan totaling \$800,000 outside the Wyoming assessment areas. This loan supported an affordable housing project that occurred in a county adjacent to the Jackson assessment area. Residents of that county commute to Jackson for work but cannot afford home prices in that assessment area. The table above does not include these loans.

INVESTMENT TEST

The bank’s Investment Test rating is low satisfactory for Wyoming. Overall, the bank has an adequate level of qualified investments in the form of securities and donations that show adequate responsiveness to credit and community development needs.

During the evaluation period, the bank held 16 qualified investments totaling \$5.3 million that directly benefited its Wyoming assessment areas. These investments include four new capital contributions totaling \$369,232 and \$4.9 million in prior-period investments. The new investments support affordable housing in the Jackson assessment area, where there is a critical need for affordable housing, due to very high median home values. New and prior-period investments benefit multiple assessment areas. The majority of investment dollars (73.0%) is concentrated in the Jackson assessment area and supports affordable housing projects, which is responsive to the needs of that area. Other investments helped revitalize and stabilize areas or support economic development initiatives.

Because the bank’s investment activities adequately address community development needs in its Wyoming assessment areas, examiners also considered the bank’s qualified Wyoming investments that are outside its assessment areas. The bank continued to hold two prior-period qualified investments totaling \$1.3 million that benefited areas of Wyoming outside the bank’s assessment areas. These investments supported economic development and revitalization and stabilization efforts.

Donations. The bank made a significant level of donations that supported organizations throughout its Wyoming assessment areas. The bank made \$365,782 in donations that directly benefit its assessment areas or a broader statewide area that includes its assessment areas. The Wyoming Qualified Investment Donations table shows the distribution of the donations by assessment area and by statewide area.

Wyoming Qualified Investment Donations						
Assessment Area	Bank		Foundation		Total	
	#	\$	#	\$	#	\$
Sheridan	42	49,068	65	21,081	107	70,149
Riverton	19	37,030	19	6,802	38	43,832
Casper MSA	38	112,798	150	86,116	188	198,914
Cheyenne MSA	9	4,250	23	8,359	32	12,609
Laramie	2	2,200	14	4,075	16	6,275
Jackson	8	25,330	15	8,123	23	33,453
State of Wyoming	1	50	1	500	2	550
Total	119	230,726	287	135,056	406	365,782

By number, the bank made the majority of donations in the Casper MSA (46.3%) and Sheridan (26.4%) assessment areas. By dollar amount, 78.1% of the donations were made to organizations that provide community services to low- and moderate-income individuals and 13.6% supported affordable housing initiatives. The bank supported food shelves, health and social services, and educational facilities that target low- and moderate-income residents, as well as many other organizations. Three large donations made in the Casper MSA were to organizations that provide educational or social services to low- and moderate-income residents. Other notable donations include support for youth-focused organizations and affordable-housing efforts.

SERVICE TEST

The Service Test rating is high satisfactory for Wyoming. Delivery systems are readily accessible to all portions of the Wyoming assessment areas. The changes the bank made to branches and ATMs did not adversely affect the accessibility of delivery systems. The hours of operation and retail services do not

vary in a way that inconveniences certain people or areas. Finally, the bank provides a relatively high level of community development in the Wyoming assessment areas.

Retail Banking Services

The bank’s delivery systems are readily accessible to all portions of the Wyoming assessment areas, and services are tailored to the convenience needs of the area. The bank currently operates 19 branches, 3 drive-up facilities and 26 ATMs in the state. The following table shows the bank’s distribution of branches, drive-up facilities, and ATMs as of 2017.

Geographic Distribution of Branches & ATMS
State of Wyoming

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	2	10.5%	0	1	0	1	1	Total	3	11.5%	1	5.9%	0	2	2	22.2%	0	1	3	3.8%	2.5%	5.5%
DTO	1		0	0				SA	1		1		0	2	0		0	1				
Moderate	2	10.5%	0	1	2	2	1	Total	4	15.4%	3	17.6%	0	0	1	11.1%	0	1	12	15.4%	13.2%	9.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	12	63.2%	0	0	7	7	5	Total	14	53.8%	9	52.9%	0	0	5	55.6%	0	0	49	62.8%	64.7%	65.7%
DTO	2		0	0				SA	3		0		0	0	3		0	0				
Upper	3	15.8%	1	1	2	3	2	Total	5	19.2%	4	23.5%	1	1	1	11.1%	0	0	13	16.7%	19.6%	18.9%
DTO	0		0	0				SA	1		1		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	1.3%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	19	100.0%	1	3	11	13	9	Total	26	100.00%	17	100.00%	1	3	9	100.00%	0	2	78	100.00%	100.00%	100.00%
DTO	3		0	0				SA	5		2		0	2	3		0	1				

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

The branches are accessible to all portions of its assessment areas. As of 2017, the bank had 10.5% and 10.5% of its branches in low- and moderate-income census tracts, respectively. These percentages compare well to demographics, given that low- and moderate-income census tracts represent 3.8% and 15.4% of the census tracts in the Wyoming assessment areas, respectively. The majority of branches and ATMs are in middle-income tracts, which is reasonable given the Wyoming assessment areas have virtually the same percentage of tracts.

The bank made changes to its branches and ATMs since the previous examination. The bank closed two branches, one in the city of Laramie and one in the city of Casper. The branch in Laramie was in a low-income tract on a university campus; the remaining Laramie branch is less than one mile away, in a moderate-income tract. The branch closure in Casper was in a moderate-income tract; the Casper downtown branch is approximately 1.3 miles away, in a low-income tract. The bank re-located one branch in the town of Gillette; the new location remained in the same upper-income census tract. The bank also closed five ATMs during the evaluation period. Overall, the branch, drive-up, and ATM closures did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals or geographies.

The bank offers the same products and services at each of its Wyoming locations. Many branches have extended weekday and weekend hours as well as drive-up facilities. Hours of operation at each branch are reasonable and do not vary in a way that inconveniences individuals or areas. In addition to branches and ATMs, the bank offers telephone, online, and mobile banking services. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit

checks, open new accounts, and apply for certain consumer loans. The bank also partners with third-party operators to provide 12 additional surcharge-free cash-dispensing-only ATMs to its customers in the Wyoming assessment areas. Finally, the bank waived standard escrow fees for some home mortgage loans it services for an affordable-housing organization in the Sheridan assessment area, and it waived deposit account service charges for an organization that provides services to low- and moderate-income seniors in the Casper assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the Wyoming assessment areas. This rating primarily reflects the bank’s performance in the full-scope assessment areas, but also recognizes the level of services in the other Wyoming assessment areas. The bank engaged in community development services in all of its Wyoming assessment areas, and it also provided some services that benefited broader regional areas that included its assessment areas and the state of Wyoming. The bank provided 37.7% and 23.2% of its community development services in the Riverton and Casper MSA assessment areas, respectively. The table below shows the distribution of community development services by type of activity and assessment area.

Wyoming Community Development Services					
<i>Assessment Area</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Revitalize and Stabilize</i>	<i>Total</i>
Sheridan	1	7	2	0	10
Riverton	2	21	0	3	26
Casper MSA	9	7	0	0	16
Cheyenne MSA	0	4	0	0	4
Laramie	0	5	2	0	7
Jackson	1	1	0	0	2
Regional Wyoming	1	0	0	0	1
State of Wyoming	1	4	0	0	5
Totals	15	49	4	3	71

Numerous bank employees provided their financial expertise and time to organizations that support community development initiatives in Wyoming. The majority of services (69.0%) were geared toward organizations that provide educational, health, and social services, and 21.1% were geared toward affordable-housing issues. Employees provided their talents to organizations that helped revitalize and stabilize low- and moderate-income, underserved, and distressed areas of Wyoming. Employees often held leadership positions with these organizations, including serving on the board of directors, on finance committees, or as presenters.

Many bank employees teach financial skills, such as the importance of saving and budgeting, to low- and moderate-income children. These services are highly responsive to the needs of the areas the bank serves and provide young people with a solid understanding of finances, which is important for future success. Bank employees also worked with families, at-risk youth, and other agencies that provide a variety of community services to low- and moderate-income residents throughout the state. This is particularly responsive to the needs of the assessment areas in the state. Based on 2017 FFIEC adjusted census data, 23.7% and 16.3% of households in the Wyoming assessment areas are low- and moderate-income, respectively; 11.1% of households are below poverty level.

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHEYENNE, WYOMING, MSA 16940 ASSESSMENT AREA

Bank Information. The bank currently operates two full-service branches with drive-up facilities, and three ATMs in the Cheyenne MSA. All branches and ATMs are located in the city of Cheyenne. By number, the bank has 2.5% of its branches in this assessment area. See the Service Test section for more details.

According to the June 30, 2017, FDIC Deposit Market Share Report, The bank ranked 3rd among 18 FDIC-insured institutions operating in the Cheyenne MSA, with an 11.4% deposit market share and \$195.0 million in deposits. The deposits in this assessment area represent 2.7% of the bank's overall deposits. The bank faces competition from several community banks, regional banks, large national banks, and credit unions.

Assessment Area Information. The Cheyenne assessment area consists of Laramie County, which is the Cheyenne MSA. Laramie County is in the southeastern corner of Wyoming, bordering Colorado to the south and Nebraska to the east. The city of Cheyenne is the county seat and the most populous city in the state of Wyoming.

The bank has not changed this assessment area since the previous evaluation; however, the income classifications of some census tracts changed based on 2017 FFIEC adjusted census data. In 2016, the income tracts in the Cheyenne MSA assessment area included six moderate, nine middle, five upper, and one unknown. The unknown-income tract is designated as a special land-use tract; it includes the Cheyenne Regional Airport and the Wyoming Air National Guard Base. This tract has no population. The following Combined Demographics Report provides demographic information for this assessment area, based on 2017 FFIEC adjusted census data and 2017 D&B data.¹⁹

¹⁹The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

Combined Demographics Report

Assessment Area: Cheyenne MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,860	19.5
Moderate-income	6	28.6	6,436	25.8	974	15.1	4,536	18.2
Middle-income	10	47.6	12,517	50.2	743	5.9	5,760	23.1
Upper-income	4	19.0	5,997	24.0	64	1.1	9,794	39.3
Unknown-income	1	4.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	24,950	100.0	1,781	7.1	24,950	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	11,717	5,843	22.8	49.9	4,230	36.1	1,644	14.0
Middle-income	20,688	13,003	50.7	62.9	5,797	28.0	1,888	9.1
Upper-income	8,851	6,786	26.5	76.7	1,635	18.5	430	4.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	41,256	25,632	100.0	62.1	11,662	28.3	3,962	9.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	682	17.5	581	16.9	68	19.0	33	30.0
Middle-income	2,432	62.4	2,132	62.1	240	67.2	60	54.5
Upper-income	771	19.8	707	20.6	48	13.4	16	14.5
Unknown-income	14	0.4	12	0.3	1	0.3	1	0.9
Total Assessment Area	3,899	100.0	3,432	100.0	357	100.0	110	100.0
Percentage of Total Businesses:			88.0		9.2		2.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	8	5.6	8	5.8	0	0.0	0	0.0
Middle-income	114	79.7	110	79.1	4	100.0	0	0.0
Upper-income	21	14.7	21	15.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	143	100.0	139	100.0	4	100.0	0	0.0
Percentage of Total Farms:			97.2		2.8		0.0	

2017 FFIEC Census Data and 2017 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the Cheyenne MSA, for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Cheyenne, WY MSA**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2016	\$82,500	0 - \$41,249	\$41,250 - \$65,999	\$66,000 - \$98,999	\$99,000 - & above
2017	\$75,500	0 - \$37,749	\$37,750 - \$60,399	\$60,400 - \$90,599	\$90,600 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family income for the Cheyenne MSA, which was \$64,589 for 2016 and \$75,732 for 2017.

Population. According to 2017 FFIEC adjusted census data, the assessment area population is 95,431. The majority by age is 25 to 64 years (52.6%), followed by 17 years and younger (23.7%), 65 years and older (13.8%), and 18 to 24 years (9.9%). According to a community contact, the area has a modestly growing population.

Housing Information. According to 2017 FFIEC adjusted census data, this assessment area has 41,256 housing units: 62.1% are owner-occupied, 28.3% are rentals, and 9.6% are vacant. The median age of the housing stock is 40 years, which is slightly higher than the statewide median of 37 years. The median housing value is \$189,950, and the affordability ratio is 32.0, compared to 30.2 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly more affordable in the Cheyenne MSA compared to other areas of Wyoming.

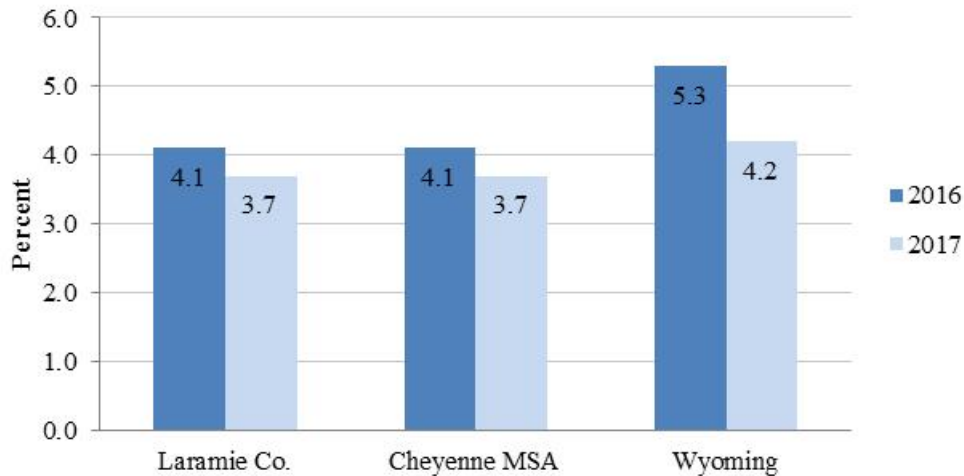
Community contacts stated that affordable housing is a concern. Affordable housing is in short supply, and prices are high relative to incomes. Housing development has not kept pace with demand. Developers working in the area are focused on building single-family dwellings on large lots, not on affordable housing. Additional challenges affecting housing development within the city include a lack of land as well as environmental risks needing remediation in two developable areas. There is little development of multifamily housing that could meet the needs of low- and moderate-income people. Developers are building townhouses and duplexes for the high-end rental market, which is needed to attract employers to the area, as well as single-family homes on large lots. There are almost no vacancies in the rental market.

General Economic and Business Information. The local economy is strong and relatively stable. Bank management and a contact indicated that the major industries in Cheyenne include government, military, health care, retail (including distribution centers), and transportation. The; contact indicated that wages are generally low, but they are somewhat offset by the low cost of living in the area. Two industries with generally higher wages are health care and government. A contact indicated that an energy company is also a large employer. Bank management indicated that oil activity in the county was up in 2017. However, continually low energy prices in the state of Wyoming, even though the local economy is more resilient than other areas of the state, is a concern. Finally, bank management indicated that the local economy has become more connected with the northern Colorado economy, as approximately 20.0% of the workforce in Cheyenne and northern Colorado commute back and forth.

As shown in the Unemployment Rates chart, the unemployment rate in the Cheyenne MSA was below the state of Wyoming average for each year of the evaluation period. The unemployment rates for the

Cheyenne MSA and for the state decreased during the evaluation period. A contact indicated that the unemployment rate is very low.

Unemployment Rates - Cheyenne WY MSA



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHEYENNE MSA

The bank's Lending Test performance in the Cheyenne assessment area is excellent. Lending levels show excellent responsiveness to assessment area credit needs. Overall, the distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The overall geographic distribution of loans is also excellent. The bank makes a relatively high level of community development loans. The bank extensively uses flexible loan programs for low- and moderate-income borrowers and small businesses in the assessment area to help meet credit needs. Examiners assigned the most weight to HMDA loans based on the total number and dollar volume of loans during the evaluation period, followed by consumer lending and small business lending.

The Investment Test performance in this assessment area is adequate. The bank made an adequate level of qualified investments, which shows adequate responsiveness to credit and community development needs.

Under the Service Test, delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Bank officers and employees provide an adequate level of community development services.

LENDING TEST

The bank's Lending Test performance in the Cheyenne assessment area is excellent.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to assessment area credit needs. The bank's market share for HMDA and small business loans is similar in 2016 and 2017. For HMDA loans, the bank ranked 1st among 171 reporting HMDA loans in 2016, with an 11.4% market share. In 2017, the bank ranked 1st among 158 HMDA lenders, with a 10.6% market share. The bank ranked 8th among 56

2017 activity is reasonable, because bank management indicated refinancing mortgage loans had slowed based on market demand. The bank's lending to low- and moderate-income borrowers is typically consistent with or exceeds aggregate lending for all loan types for both years.

Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, an individual with the highest income in the low-income bracket (\$37,749) could afford a \$113,247 house, based on the 2017 FFIEC estimated median family income of \$75,500 for the Cheyenne MSA. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$60,399), a borrower could afford a \$181,197 home. According to the 2017 FFIEC adjusted census data, the median housing value in the Cheyenne MSA is \$189,950. This data suggests that homeownership would not be affordable for many low- and moderate-income residents in the assessment area. A community contact indicated that local home prices are high relative to incomes. Another contact indicated that affordable housing is in short supply and that available homes are not typically in good condition and need significant improvements. Some low- and moderate-income individuals cannot afford to finance both the purchase and renovation of the home.

The bank makes extensive use of flexible lending programs in order to meet the credit needs of low- and moderate-income mortgage borrowers, which contributes to the overall excellent borrower distribution for HMDA lending. Programs include down payment and closing cost assistance programs that help low- and moderate-income borrowers afford homeownership. In this assessment area, the bank actively uses WCDA and Fannie Mae's HomeReady mortgage programs. The use of these programs demonstrates a willingness to meet the credit needs of low- and moderate-income borrowers. For more information on these lending programs, refer to the Institution section of this evaluation.

Consumer. The bank's consumer lending to low- and moderate-income borrowers is good. The following tables show the bank's consumer lending by product for each year. Aggregate lending data is not available for consumer loans.

2016 Consumer Loan Distribution by Income Level of Borrower Cheyenne MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	8	494	8.2	7.0	18.5
Moderate	16	808	16.5	11.5	19.1
Middle	27	2,182	27.8	31.1	23.9
Upper	42	3,098	43.3	44.1	38.6
Unknown	4	440	4.1	6.3	0.0
Total	97	7,022	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	18	247	16.2	8.7	21.2
Moderate	23	563	20.7	19.8	17.4
Middle	28	730	25.2	25.7	20.4
Upper	40	1,261	36.0	44.4	41.0
Unknown	2	37	1.8	1.3	0.0
Total	111	2,838	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	22	186	18.2	6.7	21.2
Moderate	21	351	17.4	12.6	17.4
Middle	35	858	28.9	30.8	20.4
Upper	39	1,319	32.2	47.3	41.0
Unknown	4	74	3.3	2.7	0.0
Total	121	2,788	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	9	39	37.5	29.8	21.2
Moderate	5	43	20.8	32.8	17.4
Middle	4	14	16.7	10.7	20.4
Upper	6	35	25.0	26.7	41.0
Unknown	0	0	0.0	0.0	0.0
Total	24	131	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	57	966	16.1	7.6	NA
Moderate	65	1,765	18.4	13.8	NA
Middle	94	3,784	26.6	29.6	NA
Upper	127	5,713	36.0	44.7	NA
Unknown	10	551	2.8	4.3	NA
Total	353	12,779	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Cheyenne MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	142	5.2	1.9	19.5
Moderate	7	488	9.1	6.6	18.2
Middle	18	1,071	23.4	14.6	23.1
Upper	47	5,140	61.0	69.9	39.3
Unknown	1	510	1.3	6.9	0.0
Total	77	7,351	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	13	170	16.5	8.2	22.5
Moderate	8	261	10.1	12.5	17.6
Middle	18	474	22.8	22.7	18.5
Upper	37	1,114	46.8	53.5	41.4
Unknown	3	65	3.8	3.1	0.0
Total	79	2,084	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	19	398	16.2	13.9	22.5
Moderate	13	209	11.1	7.3	17.6
Middle	31	694	26.5	24.2	18.5
Upper	53	1,523	45.3	53.2	41.4
Unknown	1	40	0.9	1.4	0.0
Total	117	2,864	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	47	21.1	10.8	22.5
Moderate	9	57	23.7	13.1	17.6
Middle	9	77	23.7	17.7	18.5
Upper	12	254	31.6	58.4	41.4
Unknown	0	0	0.0	0.0	0.0
Total	38	435	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	44	757	14.1	5.9	NA
Moderate	37	1,015	11.9	8.0	NA
Middle	76	2,316	24.4	18.2	NA
Upper	149	8,031	47.9	63.1	NA
Unknown	5	615	1.6	4.8	NA
Total	311	12,734	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank’s overall lending to low-income borrowers was below demographics and slightly above demographics for moderate-income borrowers. In 2017, the bank’s overall lending to both low- and moderate-income borrowers was below demographics. However, lending volume decreased somewhat in

2017, which may have affected lending to low- and moderate-income borrowers. By product category, the lending to low- and moderate-income borrowers varies when compared to demographics. In both years, the bank’s lowest level of lending to low- and moderate-income borrowers was in home equity lending. This level of performance, however, is reasonable. As previously discussed, affordable housing is a concern in the assessment area. With respect to home equity loans, as previously mentioned in this evaluation, low- and moderate-income individuals may have difficulty purchasing a home and, in addition, may lack sufficient equity for the these types of loans.

The bank also continues to offer small-dollar consumer loans. In 2016, the bank originated 6.5% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 82.6% were to low- and moderate-income borrowers. In 2017, the bank originated 4.8% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 46.7% were to low- and moderate-income borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of low- and moderate-income borrowers in the assessment area.

Bank management indicated that competition for consumer loans is strong, especially with credit unions. Credit unions routinely advertise for home equity loans, and motor vehicle lending is very rate competitive. According to bank management, HMDA lending became an emerging focus.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following tables show the bank’s small business loans by revenue and loan size for the evaluation period.

Small Business Loans by Business Revenue & Loan Size
Assessment Area: Cheyenne MSA

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2017						Bank & Aggregate Lending Comparison											
	Bank			Total Businesses	2016			2017			2016			2017				
	Count	Dollar			Count	Dollar		Count	Dollar		Count	Dollar						
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
BUSINESS REVENUE	\$1million or Less	74	72.5%	\$2,783	54.1%	88.0%	79	64.2%	53.0%	\$4,412	48.4%	40.4%	74	72.5%	56.3%	\$2,783	54.1%	41.8%
	Over \$1 Million	19	18.6%	\$2,007	39.0%	9.2%	36	29.3%					19	18.6%				
	Total Rev. available	93	91.1%	\$4,790	93.1%	97.2%	115	93.5%					93	91.1%				
	Rev. Not Known	9	8.8%	\$350	6.8%	2.8%	8	6.5%					9	8.8%				
	Total	102	100.0%	\$5,140	100.0%	100.0%	123	100.0%					102	100.0%				
LOAN SIZE	\$100,000 or Less	93	91.2%	\$2,856	55.6%		104	84.6%	97.1%	\$3,009	33.0%	53.5%	93	91.2%	96.7%	\$2,856	55.6%	52.7%
	\$100,001 - \$250,000	6	5.9%	\$880	17.1%		7	5.7%	1.1%	\$1,407	15.4%	8.0%	6	5.9%	1.5%	\$880	17.1%	9.0%
	\$250,001 - \$1 Million	3	2.9%	\$1,404	27.3%		12	9.8%	1.7%	\$4,697	51.5%	38.5%	3	2.9%	1.8%	\$1,404	27.3%	38.2%
	Total	102	100.0%	\$5,140	100.0%		123	100.0%	100.0%	\$9,113	100.0%	100.0%	102	100.0%	100.0%	\$5,140	100.0%	100.0%
	Rev \$1 Mill or Less	69	93.2%	\$2,103	75.6%													
\$100,001 - \$250,000	5	6.8%	\$680	24.4%														
\$250,001 - \$1 Million	0	0.0%	\$0	0.0%														
Total	74	100.0%	\$2,783	100.0%														

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data and 2017 D&B Information

The bank originated 64.2% of its small business loans to small businesses in 2016 and 72.5% in 2017. According to D&B data, in 2017, 88.0% of businesses in the assessment area had gross annual revenues of \$1 million or less, and in 2016, the figure was 88.9%. The bank’s lending was below demographics for both years. However, the bank’s lending exceeded aggregate lenders each year. The bank’s performance is excellent because it competes against many institutions, including credit card lenders. Bank management indicated that the small business lending market is even more competitive than the residential real estate market. The bank makes loans in varying sizes. The majority of the bank’s small business loans to small businesses were for amounts of \$100,000 or less. This indicates a willingness to meet the credit needs of all businesses, especially small businesses, since they tend to request smaller-dollar loans.

Finally, the bank makes extensive use of flexible loan programs in this assessment area. Specifically, the bank originates SBA loans, which help meet the needs of the small businesses in the area.

Geographic Distribution

Overall, the geographic distribution of HMDA, consumer, and small business in the Cheyenne MSA assessment area is excellent, and does not reveal any unexplained gaps in lending. The assessment area had six moderate-income census tracts in 2016 and 2017. Despite the same number of moderate-income tracts each year, the income classifications of some tracts changed based on 2017 FFIEC adjusted census data.²⁰ As of 2017, the largest percentage of tracts (47.6%) are middle income. In 2016, one of the branches (Cheyenne Main) was located in a moderate-income tract; the income designation of this tract changed based on 2017 FFIEC adjusted census data. As of 2017, both branches are located in middle-income tracts, near moderate-income tracts. The bank's Cheyenne Main office is located downtown.

The bank made loans in all moderate-income tracts in 2016 and 2017. It also originated loans in all tracts during the evaluation period, except for unknown-income tract 9808.01. As mentioned previously, this tract is designated as a special land-use tract, which includes the Cheyenne Regional Airport and the Wyoming Air National Guard Base.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is excellent. Examiners did not separately evaluate the bank's multifamily loans because of limited lending for this product type. The following table shows the bank's HMDA data by census tract income level and product type for 2016 and 2017. The table also includes aggregate lending data for each year.

²⁰ Census tract 7.00 changed from moderate income in 2016 to middle income in 2017. Additionally, tract 11.00 changed from middle income to moderate income in 2017.

Geographic Distribution of HMDA Loans
Assessment Area: Cheyenne MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016						2017					
		Bank				Owner Occupied Units %	Count		Dollar				Count		Dollar			
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	Agg %	Bank #	Agg %	Bank \$ (000s)	%	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	85	19.0%	\$12,421	13.1%	22.8%	122	28.2%	23.8%	\$18,187	20.7%	18.4%	85	19.0%	19.5%	\$12,421	13.1%	14.2%
	Middle	245	54.7%	\$52,847	55.6%	50.7%	228	52.8%	57.4%	\$47,787	54.5%	57.0%	245	54.7%	59.4%	\$52,847	55.6%	60.0%
	Upper	118	26.3%	\$29,724	31.3%	26.5%	82	19.0%	18.8%	\$21,704	24.8%	24.6%	118	26.3%	21.2%	\$29,724	31.3%	25.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	448	100.0%	\$94,992	100.0%	100.0%	432	100.0%	100.0%	\$87,678	100.0%	100.0%	448	100.0%	100.0%	\$94,992	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	16	17.2%	\$1,965	10.5%	22.8%	26	14.6%	17.5%	\$2,971	8.7%	13.8%	16	17.2%	16.5%	\$1,965	10.5%	13.0%
	Middle	50	53.8%	\$10,230	54.8%	50.7%	88	49.4%	55.1%	\$14,891	43.4%	51.4%	50	53.8%	56.8%	\$10,230	54.8%	54.6%
	Upper	27	29.0%	\$6,481	34.7%	26.5%	64	36.0%	27.4%	\$16,446	47.9%	34.8%	27	29.0%	26.7%	\$6,481	34.7%	32.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	93	100.0%	\$18,676	100.0%	100.0%	178	100.0%	100.0%	\$34,308	100.0%	100.0%	93	100.0%	100.0%	\$18,676	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	10.8%	\$186	3.1%	22.8%	10	29.4%	18.2%	\$1,064	23.5%	14.2%	4	10.8%	19.9%	\$186	3.1%	14.8%
	Middle	25	67.6%	\$4,027	67.8%	50.7%	15	44.1%	54.7%	\$2,025	44.6%	52.2%	25	67.6%	52.7%	\$4,027	67.8%	49.4%
	Upper	8	21.6%	\$1,723	29.0%	26.5%	9	26.5%	27.0%	\$1,448	31.9%	33.5%	8	21.6%	27.3%	\$1,723	29.0%	35.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	37	100.0%	\$5,936	100.0%	100.0%	34	100.0%	100.0%	\$4,537	100.0%	100.0%	37	100.0%	100.0%	\$5,936	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$121	23.3%	26.7%	0	0.0%	25.0%	\$0	0.0%	13.4%	1	50.0%	20.0%	\$121	23.3%	3.6%
	Middle	1	50.0%	\$398	76.7%	57.2%	1	100.0%	37.5%	\$315	100.0%	56.0%	1	50.0%	40.0%	\$398	76.7%	27.7%
	Upper	0	0.0%	\$0	0.0%	16.1%	0	0.0%	37.5%	\$0	0.0%	30.6%	0	0.0%	40.0%	\$0	0.0%	68.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$519	100.0%	100.0%	1	100.0%	100.0%	\$315	100.0%	100.0%	2	100.0%	100.0%	\$519	100.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	106	18.3%	\$14,693	12.2%	22.8%	158	24.5%	21.2%	\$22,222	17.5%	16.5%	106	18.3%	18.6%	\$14,693	12.2%	13.8%
	Middle	321	55.3%	\$67,502	56.2%	50.7%	332	51.5%	56.4%	\$65,018	51.3%	54.8%	321	55.3%	58.3%	\$67,502	56.2%	58.1%
	Upper	153	26.4%	\$37,928	31.6%	26.5%	155	24.0%	22.5%	\$39,598	31.2%	28.7%	153	26.4%	23.1%	\$37,928	31.6%	28.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	580	100.0%	\$120,123	100.0%	100.0%	645	100.0%	100.0%	\$126,838	100.0%	100.0%	580	100.0%	100.0%	\$120,123	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016, the bank’s HMDA lending in moderate-income tracts exceeded aggregate lenders. According to 2016 FFIEC adjusted census data, 27.8% of the families in the assessment area resided in moderate-income tracts. In addition, 26.9% of owner-occupied units were located in moderate-income tracts. The bank’s lending performance in moderate-income tracts was slightly below demographics. HMDA lending opportunities in the moderate-income tracts were somewhat limited, as 37.0% of the housing units in the moderate-income tracts were rental units. Only 50.9% of the housing units in moderate-income tracts were owner occupied and 12.1% of housing units were vacant.

In 2017, the bank’s HMDA lending in moderate-income tracts was consistent with aggregate lenders. According to 2017 FFIEC adjusted census data, 25.8% of the families in the assessment area resided in moderate-income tracts. In addition, 22.8% of owner-occupied units were located in moderate-income tracts. The bank’s lending performance in moderate-income tracts was below demographics. Similar to 2016, 49.9% of the housing units in the moderate-income tracts were owner-occupied, 36.1% were rental, and 14.0% were vacant.

The bank made HMDA loans in all moderate-income tracts in 2016 and all but one moderate-income tract in 2017. Specifically, the bank did not make a HMDA loan in tract 11.00 in 2017; this is reasonable

because the Francis E. Warren Air Force Base (AFB) is in the tract.²¹ According to bank management, it makes retail loans to the airmen. The moderate-income tracts generally have commercial property and businesses in them. Some moderate-income tracts are mixed with businesses and residences. The moderate-income tracts where the bank made the fewest number of HMDA loans include a tract that contains a mix of residential and commercial areas, including part of downtown Cheyenne, and a tract that is partly in the southern section of the city limits and that includes rural areas. Finally, Cheyenne has extensive banking opportunities for residents, and the bank faces strong competition for HMDA loans.

Consumer. The geographic distribution of the bank's consumer loans is good. The tables below show the geographic distribution of the bank's 2016 and 2017 consumer loans. Aggregate lending data is not available for consumer loans.

²¹ This military base is also in a small portion of middle-income tract 19.02, which is adjacent to tract 11.00.

2016 Consumer Loan Distribution by Income Level of Geography Cheyenne MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	22	1,112	22.7	15.8	26.9
Middle	45	3,708	46.4	52.8	47.3
Upper	30	2,202	30.9	31.4	25.9
Unknown	0	0	0.0	0.0	0.0
Total	97	7,022	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	20	466	18.0	16.4	32.0
Middle	60	1,386	54.1	48.8	46.6
Upper	31	986	27.9	34.7	21.4
Unknown	0	0	0.0	0.0	0.0
Total	111	2,838	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	24	408	19.8	14.6	32.0
Middle	69	1,590	57.0	57.0	46.6
Upper	28	790	23.1	28.3	21.4
Unknown	0	0	0.0	0.0	0.0
Total	121	2,788	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	8	32	33.3	24.4	32.0
Middle	12	63	50.0	48.1	46.6
Upper	4	36	16.7	27.5	21.4
Unknown	0	0	0.0	0.0	0.0
Total	24	131	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	74	2,018	21.0	15.8	NA
Middle	186	6,747	52.7	52.8	NA
Upper	93	4,014	26.3	31.4	NA
Unknown	0	0	0.0	0.0	NA
Total	353	12,779	100.0	100.0	0.0

2016 FFIEC Census Data and 2015 ACS Data

In 2016, the bank’s lending performance in the moderate-income tracts was below demographics, with the exception of other-unsecured lending. For this product, the bank’s lending in moderate-income tracts was generally consistent with demographics. In 2016, 32.0% of households resided in the moderate-income tracts and 54.3% of these households were low- or moderate-income. In addition, 16.2% of the households in the moderate-income tracts lived below the poverty level. Many of these households would likely not be able to afford a consumer loan.

2017 Consumer Loan Distribution by Income Level of Geography Cheyenne MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	8	402	10.4	5.5	22.8
Middle	36	3,159	46.8	43.0	50.7
Upper	33	3,790	42.9	51.6	26.5
Unknown	0	0	0.0	0.0	0.0
Total	77	7,351	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	19	393	24.1	18.9	27.0
Middle	39	1,008	49.4	48.4	50.4
Upper	21	683	26.6	32.8	22.6
Unknown	0	0	0.0	0.0	0.0
Total	79	2,084	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	18	355	15.4	12.4	27.0
Middle	70	1,701	59.8	59.4	50.4
Upper	29	808	24.8	28.2	22.6
Unknown	0	0	0.0	0.0	0.0
Total	117	2,864	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	8	55	21.1	12.6	27.0
Middle	20	259	52.6	59.5	50.4
Upper	10	121	26.3	27.8	22.6
Unknown	0	0	0.0	0.0	0.0
Total	38	435	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	53	1,205	17.0	9.5	NA
Middle	165	6,127	53.1	48.1	NA
Upper	93	5,402	29.9	42.4	NA
Unknown	0	0	0.0	0.0	NA
Total	311	12,734	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

In 2017, the bank’s lending performance in the moderate-income census tracts was below demographics for all consumer loan types. In 2017, 27.0% of households resided in the moderate-income tracts and 58.5% of these households are low- or moderate-income. In addition, 16.0% of the households in the moderate-income tracts lived below the poverty level. Many of these households would likely not be able to afford a consumer loan.

The bank originated consumer loans in all moderate-income tracts for both years. Its performance is good, for several reasons, even though its performance is typically below demographics. Bank management

indicated that competition for consumer loans is strong, especially with credit unions. Further, the bank’s primary lending focus in this market is HMDA loans. Finally, the moderate-income tracts, especially the ones in or near downtown, are located in areas where consumers have access to numerous banking options.

Small Business. The geographic distribution of small business loans is good. The following tables show the geographic distribution of the bank’s small business loans, as well as aggregate lending data for 2016 and 2017.

Geographic Distribution of Small Business Loans

Assessment Area: Cheyenne MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2017					2016					2017						
	Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ 000s	\$ %	\$ %	Bank #	Agg %	\$ 000s	\$ %	Agg \$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	23	22.5%	\$2,301	44.8%	16.9%	48	39.0%	55.5%	\$3,928	43.1%	57.1%	23	22.5%	13.2%	\$2,301	44.8%	17.0%
Middle	50	49.0%	\$1,841	35.8%	62.1%	49	39.8%	24.2%	\$3,378	37.1%	22.8%	50	49.0%	69.3%	\$1,841	35.8%	65.7%
Upper	29	28.4%	\$998	19.4%	20.6%	26	21.1%	17.6%	\$1,807	19.8%	15.2%	29	28.4%	15.3%	\$998	19.4%	12.2%
Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	3.1%	0	0.0%	0.3%	\$0	0.0%	3.3%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	1.9%	0	0.0%	1.9%	\$0	0.0%	1.8%
<i>Total</i>	<i>102</i>	<i>100.0%</i>	<i>\$5,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>123</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>102</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,140</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

In 2016, the bank originated 39.0% of its small business loans in moderate-income tracts, and aggregate lenders originated 55.5%. According to 2016 D&B data, 43.1% of small businesses were located in the moderate-income tracts. The bank’s lending was below aggregate lenders and demographics. In 2017, the bank’s lending greatly exceeded aggregate lenders and demographics. According to 2017 D&B data, 16.9% of small businesses were located in the moderate-income tracts.²²

The bank originated small business loans in all moderate-income tracts in 2016, and all but one of the moderate-income tracts in 2017. Specifically, the bank did not originate a small business loan in tract 11.00 in 2017. As mentioned, the AFB is in tract 11.00.

Community Development Lending

The bank made a relatively high level of community development loans in this assessment area. It originated two community development loans, totaling \$518,882, which provided funding for affordable rental housing. Bank management and community contacts identified affordable housing as a concern in the assessment area. As mentioned, one contact noted that there is minimal development of multifamily housing that could meet the needs of low- and moderate-income people. Based on the volume, strong competition, and affordable housing concerns, the bank’s community development lending in this assessment area demonstrates good responsiveness to credit needs.

INVESTMENT TEST

The bank made an adequate level of qualified investments in the Cheyenne MSA assessment area, showing adequate responsiveness to area needs. The level of the bank’s qualified investments in the form

²² Census tract 7.00 changed from moderate income to middle income in 2017; this tract is located in downtown Cheyenne, where many businesses are located. This helps explain the change in D&B demographics.

of securities is adequate. The bank holds two prior-period bonds totaling \$1.2 million that directly benefit the Cheyenne MSA assessment area.

The bank made an adequate level of qualified investments in the form of donations as shown in the table at right. The majority of donations focus on community services targeted to low- and moderate-income individuals. The donations helped local organizations provide essential services to those in need, including children, single mothers, and individuals with disabilities. The bank also made a donation to an organization that promotes job creation in Laramie County.

Qualified Investment Donations in the Cheyenne MSA Assessment Area		
<i>First Interstate Bank</i>	#	\$
Community Service	8	3,250
Economic Development	1	1,000
Total	9	4,250
<i>Foundation</i>	#	\$
Community Service	23	8,359
Total	23	8,359
Grand Total	32	12,609

SERVICE TEST

The bank’s delivery systems are readily accessible to residents and businesses throughout the assessment area, and services do not vary in a way that inconveniences particular individuals or areas. Services and hours are tailored to the convenience and needs of the assessment area. The bank provides an adequate level of community development services.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different income levels. The bank’s services do not vary in a way that inconveniences certain individuals or areas. The bank operates two full-service branches in Cheyenne and a stand-alone cash-dispensing-only ATM at a local mall. Both branches have deposit-taking ATMs and drive-up facilities that offer weekend and extended weekday hours. In 2016, one of the branches (Cheyenne Main) was located in a moderate-income tract; the income designation of this tract changed based on 2017 FFIEC adjusted census data. As of 2017, both branches are located in middle-income tracts. The Cheyenne main office is less than 1.5 miles from four moderate-income tracts, and the Dell Range branch is less than two miles from two moderate-income tracts, which makes the branches readily accessible to people in those tracts and to people of different income levels. The bank did not close any branches during the evaluation period.

The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours. Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts and apply for some consumer loans.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMs

Assessment Area: Cheyenne MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0	0			
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	6	28.6%	27.0%	17.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	100.0%	0	0	2	2	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	10	47.6%	50.4%	62.4%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	19.0%	22.6%	19.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	4.8%	0.0%	0.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	2	100.0%	0	0	2	2	2	Total	3	100.0%	2	100.0%	0	0	1	100.0%	0	0	21	100.0%	100.0%	100.0%
DTO	0		0	0				SA	1		0		0	0	1		0	0				

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides an adequate level of community development services in the assessment area. Three bank employees provided four services to three organizations during the evaluation period. Bank employees served on the boards of organizations that provide programs for people with disabilities, health care, and food services. These organizations primarily serve low- and moderate-income individuals.

NONMETROPOLITAN STATEWIDE AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RIVERTON, WYOMING, ASSESSMENT AREA

Bank Information. The bank currently operates two full-service branches, two ATMs, and a stand-alone drive-up facility in the Riverton assessment area. By number, the bank has 3.7% of its branches in this assessment area. See the Service Test section for more details.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank ranks first among seven FDIC-insured institutions operating in the assessment area, with a 37.4% deposit market share and \$267.0 million in deposits. The deposits in this assessment area represent 3.7% of the bank's overall deposits. The bank faces competition from several community banks, regional banks, large national banks, and credit unions.

Assessment Area Information. The Riverton assessment area consists of Fremont County. It is bordered by the Jackson and Casper MSA assessment areas. Most of the Wind River Indian Reservation and some national forestland is located in this assessment area. The reservation is home to two American Indian tribes: the Eastern Shoshone Tribe (approximately 4,500 enrolled members) and the Northern Arapaho Tribe (approximately 8,000 enrolled members).²³ The reservation has a mix of trust and fee simple lands, according to community contacts. The bank's Riverton branch and stand-alone drive-up facility are in the reservation, and the Lander branch is less than two miles away.

The bank has not changed this assessment area since the previous evaluation; however, the income classifications of some census tracts changed based on 2017 FFIEC adjusted census data. In 2016, the assessment area included five moderate-income and five middle-income tracts. There were no distressed or underserved middle-income tracts during the evaluation period. The Combined Demographics Report on the following page provides demographic information for this assessment area, based on 2017 FFIEC adjusted census data and 2017 D&B data.²⁴

²³A community contact provided the estimated enrollment figures.

²⁴The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data.

Combined Demographics Report

Assessment Area: Riverton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,423	23.9
Moderate-income	2	20.0	2,142	21.2	308	14.4	2,077	20.5
Middle-income	8	80.0	7,976	78.8	701	8.8	2,271	22.4
Upper-income	0	0.0	0	0.0	0	0.0	3,347	33.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	10	100.0	10,118	100.0	1,009	10.0	10,118	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,513	2,117	19.5	60.3	1,068	30.4	328	9.3
Middle-income	14,210	8,758	80.5	61.6	3,387	23.8	2,065	14.5
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	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-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	251	14.9	208	14.0	36	22.2	7	24.1
Middle-income	1,431	85.1	1,283	86.0	126	77.8	22	75.9
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,682	100.0	1,491	100.0	162	100.0	29	100.0
Percentage of Total Businesses:			88.6		9.6		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	22	14.1	22	14.2	0	0.0	0	0.0
Middle-income	134	85.9	133	85.8	1	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	156	100.0	155	100.0	1	100.0	0	0.0
Percentage of Total Farms:			99.4		0.6		0.0	

2017 FFIEC Census Data and 2017 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of Wyoming for the year of loan origination. The following

table shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels
Wyoming State Nonmetropolitan Area

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2016	\$72,200	0 - \$36,099	\$36,100 - \$57,759	\$57,760 - \$86,639	\$86,640 - & above
2017	\$74,700	0 - \$37,349	\$37,350 - \$59,759	\$59,760 - \$89,639	\$89,640 - & above

For purposes of classifying census tracts by income level, this evaluation uses FFIEC’s adjusted census data median family income for the nonmetropolitan areas of Wyoming, which was \$67,040 for 2016 and \$72,833 for 2017.

Population. According to 2017 FFIEC census data, the population of the assessment area is 40,755. The majority by age is 25 to 64 years (50.5%), followed by 17 years and younger (25.2%), 65 years and older (15.8%), and 18 to 24 years (8.5%). Based on the same data, 18.9% of the population in the assessment area is American Indian. The population of Riverton and Lander have remained relatively stable over many years based on U.S. Census Bureau data.

Housing Information. According to 2017 FFIEC adjusted census data, this assessment area has 17,723 housing units: 61.4% are owner-occupied, 25.1% are rental units, and 13.5% are vacant. The median age of the housing stock in the assessment area is 46 years, which is higher than the median housing age of 37 years for all Wyoming nonmetropolitan areas. The median housing value is \$186,521 and the affordability ratio is 27.9, compared to 29.0 for all nonmetropolitan areas of Wyoming. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly less affordable in the Riverton assessment area.

According to a community contact, the housing market varies across Fremont County, but affordable housing is in low supply and not under development. Housing prices in Riverton have declined and prices in other parts of the county, such as the northwestern corner near Jackson Hole, Wyoming, have increased. Despite a decline in home prices in Riverton, the prices are high relative to local wages. The prices of homes in Lander are higher than those in Riverton. Construction costs, which reflect tightness in the skilled labor market and high transportation expenses for construction materials, limit development of new housing. Contacts also indicated that there is a shortage of affordable housing on the reservation. The tribes own approximately 300 rental units, some of which are houses with rents as low as \$20 a month. Finally, bank management noted that there has been an increase in the number of homes on the market in Fremont County because of the decline in the local energy industry.

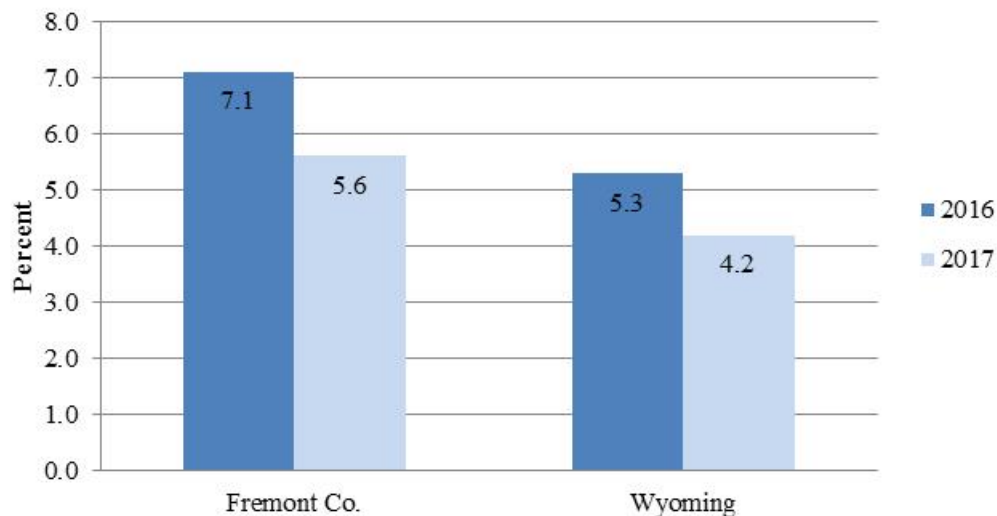
General Economic and Business Information. Bank management and community contacts indicated that energy and agriculture are the major industries. These industries have a cyclical nature and had been declining for several years. A contact indicated that oil has declined by as much as 50%. Fremont County has a significant mineral extraction sector. Bank management indicated that the energy cycle began to improve in 2017. Agricultural commodity prices showed gradual improvement beginning in 2017. A contact indicated that alfalfa, a key local crop exported to other states, has had high prices, and alfalfa producers continue to make investments in their own operations. Overall, though, agricultural producers and energy businesses have focused on reducing expenses rather than growth, and there is a lack of confidence in the economy. Another important industry is tourism, which has remained stable according to bank management. The local casinos continue to attract visitors, and the 2017 solar eclipse attracted

approximately 41,700 individuals, which increased tourism revenues by about \$3.7 million. Some of the largest employers in the county include a casino, school districts, health-care providers, and government.

A contact indicated that economic development opportunities on the reservation are very limited. The unemployment rate is high among tribal members, and poverty is an issue due to the lack of jobs. A few employers, such as the school districts, Indian Health Service, road construction businesses, and casinos offer steady jobs on the reservation. Wages are generally low, as is the local cost of living.

As shown in the Unemployment Rates chart below, the rate is higher in Fremont County compared to the statewide rate for each year of the evaluation period. The unemployment rates for Fremont County and for the state decreased during the evaluation period.

Unemployment Rates - Riverton WY



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RIVERTON ASSESSMENT AREA

The bank’s Lending Test performance in the Riverton assessment area is excellent. Lending levels show excellent responsiveness to assessment area credit needs. Overall, the distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes. Overall, the geographic distribution of loans is good. The bank is a leader in making community development loans. The bank extensively uses flexible loan programs for low- and moderate-income borrowers. Examiners assigned the most weight to HMDA and small farm loans.

Overall, the Investment Test performance in the Riverton assessment area is significant. The bank made an excellent level of qualified investments in the form of donations and an adequate level in the form of securities, which show good responsiveness to credit and community development needs.

Finally, under the Service Test, the bank’s delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas. Further, the bank provides a relatively high level of community development services in the assessment area.

LENDING TEST

The bank's Lending Test performance in the Riverton assessment area is excellent.

Lending Activity

The bank's lending activity reflects excellent responsiveness to assessment area credit needs. In 2016, the bank ranked 1st among 92 lenders reporting HMDA loan data, with a 20.3% market share. In 2017, the bank ranked 1st among 89 lenders reporting HMDA loan data, with a 16.5% market share. For CRA reporters, the bank ranked 1st among 29 lenders reporting small business and small farm loan data in 2016, with a 30.3% market share. In 2017, the bank ranked 1st among 26 lenders reporting CRA small business and small farm loan data, with a 34.3% market share. During the evaluation period, lending activity in this assessment area represented 3.7% by number and 3.5% by dollar amount of the bank's total lending. Within the bank's Wyoming assessment areas, the lending activity in the Riverton assessment area was 12.9% by number and 10.0% by dollar amount.

Distribution by Borrower Income Level and by Size of Business and Farm

Overall, the bank's distribution of loans reflects excellent dispersion among borrowers of different income levels and businesses and farms of different sizes.

Residential Real Estate. The bank's HMDA lending to low- and moderate-income borrowers is excellent. The following table shows the bank's HMDA loan data by income level and product type for 2016 and 2017. The table also includes aggregate lending data for each year. Examiners did not separately evaluate the bank's home improvement or multifamily loans because of limited lending for these products.

Borrower Distribution of HMDA Loans
Assessment Area: Riverton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	9	11.4%	\$857	6.1%	23.9%	10	12.8%	10.5%	\$1,048	7.3%	6.3%	9	11.4%	7.3%	\$857	6.1%	4.5%
	Moderate	24	30.4%	\$3,276	23.4%	20.5%	14	17.9%	24.8%	\$1,870	13.1%	21.6%	24	30.4%	26.1%	\$3,276	23.4%	22.2%
	Middle	27	34.2%	\$5,014	35.8%	22.4%	18	23.1%	25.1%	\$2,676	18.8%	24.6%	27	34.2%	22.5%	\$5,014	35.8%	23.0%
	Upper	18	22.8%	\$4,757	34.0%	33.1%	34	43.6%	26.3%	\$8,338	58.5%	34.5%	18	22.8%	24.5%	\$4,757	34.0%	32.5%
	Unknown	1	1.3%	\$91	0.7%	0.0%	2	2.6%	13.3%	\$333	2.3%	13.0%	1	1.3%	19.6%	\$91	0.7%	17.8%
	Total	79	100.0%	\$13,995	100.0%	100.0%	78	100.0%	100.0%	\$14,265	100.0%	100.0%	79	100.0%	100.0%	\$13,995	100.0%	100.0%
HOME REFINANCE	Low	3	10.0%	\$223	3.2%	23.9%	10	15.4%	8.3%	\$1,405	12.0%	5.2%	3	10.0%	11.5%	\$223	3.2%	6.5%
	Moderate	5	16.7%	\$540	7.7%	20.5%	12	18.5%	16.1%	\$1,696	14.5%	11.4%	5	16.7%	20.9%	\$540	7.7%	14.8%
	Middle	5	16.7%	\$951	13.6%	22.4%	19	29.2%	24.4%	\$2,927	25.1%	21.9%	5	16.7%	23.0%	\$951	13.6%	19.5%
	Upper	15	50.0%	\$3,127	44.6%	33.1%	22	33.8%	30.2%	\$5,419	46.4%	36.8%	15	50.0%	26.2%	\$3,127	44.6%	26.9%
	Unknown	2	6.7%	\$2,164	30.9%	0.0%	2	3.1%	21.0%	\$231	2.0%	24.6%	2	6.7%	18.4%	\$2,164	30.9%	32.3%
	Total	30	100.0%	\$7,005	100.0%	100.0%	65	100.0%	100.0%	\$11,678	100.0%	100.0%	30	100.0%	100.0%	\$7,005	100.0%	100.0%
HOME IMPROVEMENT	Low	2	16.7%	\$100	14.2%	23.9%	2	14.3%	7.9%	\$13	1.8%	2.1%	2	16.7%	18.0%	\$100	14.2%	7.6%
	Moderate	4	33.3%	\$268	38.0%	20.5%	4	28.6%	23.7%	\$21	2.9%	15.3%	4	33.3%	34.0%	\$268	38.0%	36.2%
	Middle	2	16.7%	\$124	17.6%	22.4%	3	21.4%	31.6%	\$342	48.0%	30.6%	2	16.7%	12.0%	\$124	17.6%	11.4%
	Upper	4	33.3%	\$214	30.3%	33.1%	5	35.7%	28.9%	\$337	47.3%	35.4%	4	33.3%	32.0%	\$214	30.3%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.9%	\$0	0.0%	16.7%	0	0.0%	4.0%	\$0	0.0%	2.6%
	Total	12	100.0%	\$706	100.0%	100.0%	14	100.0%	100.0%	\$713	100.0%	100.0%	12	100.0%	100.0%	\$706	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	33.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$947	100.0%	0.0%	1	100.0%	100.0%	\$175	100.0%	100.0%	2	100.0%	100.0%	\$947	100.0%	100.0%
	Total	2	100.0%	\$947	100.0%	100.0%	1	100.0%	100.0%	\$175	100.0%	100.0%	2	100.0%	100.0%	\$947	100.0%	100.0%
HMDA TOTALS	Low	14	11.4%	\$1,180	5.2%	23.9%	22	13.9%	9.4%	\$2,466	9.2%	5.7%	14	11.4%	9.4%	\$1,180	5.2%	5.3%
	Moderate	33	26.8%	\$4,084	18.0%	20.5%	30	19.0%	20.8%	\$3,587	13.4%	16.6%	33	26.8%	24.8%	\$4,084	18.0%	20.0%
	Middle	34	27.6%	\$6,089	26.9%	22.4%	40	25.3%	25.0%	\$5,945	22.2%	23.5%	34	27.6%	21.8%	\$6,089	26.9%	21.2%
	Upper	37	30.1%	\$8,098	35.7%	33.1%	61	38.6%	28.1%	\$14,094	52.5%	35.5%	37	30.1%	25.5%	\$8,098	35.7%	30.6%
	Unknown	5	4.1%	\$3,202	14.1%	0.0%	5	3.2%	16.7%	\$739	2.8%	18.7%	5	4.1%	18.5%	\$3,202	14.1%	22.9%
	Total	123	100.0%	\$22,653	100.0%	100.0%	158	100.0%	100.0%	\$26,831	100.0%	100.0%	123	100.0%	100.0%	\$22,653	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016, the bank's performance was below demographics for low-income borrowers, and slightly below, but much closer to, moderate-income borrowers. According to 2016 FFIEC adjusted census data, 26.8% of the families in the assessment area were low income and 21.5% were moderate income. The bank exceeded aggregate lenders in lending to low-income borrowers and was just slightly below aggregate in lending to moderate-income borrowers. In 2017, the bank's lending was below demographics for low-income borrowers but exceeded demographics for moderate-income borrowers. The bank exceeded aggregate lenders when lending to both low- and moderate-income borrowers.

The bank generally exceeded aggregate lenders for home purchase and refinance loans to low-income borrowers, and was generally below aggregate lenders for moderate-income borrowers for these loan types. Bank management stated that refinance activity had declined during the evaluation period, given the rising rate environment. The majority of the population took advantage of refinancing in previous years when rates were much lower.

A community contact stated affordable housing for lower-income individuals is in low supply across the assessment area. Using the assumption that a borrower can afford a home for approximately three times the borrower's annual income, an individual with the highest income in the low-income bracket (\$37,349) could afford a \$112,047 house, based on the 2017 FFIEC estimated median family income of \$74,700 for the nonmetropolitan areas of Wyoming. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$59,759), a borrower could afford a \$179,277 home. According to the 2017 FFIEC adjusted census data, the median housing value in the assessment area is \$186,521. This data suggests that homeownership would not be affordable for many low- and moderate-income residents in the assessment area. A community contact indicated home prices in Riverton are high relative

to local wages and that there is a shortage of affordable housing on the reservation. Finally, a contact indicated that some of the land on the reservation has highly fractionalized ownership, which can hinder land usage and affect loan demand.

The bank makes extensive use of flexible lending programs that help low- and moderate-income individuals achieve homeownership. In this assessment area, the bank actively uses WCDA programs, which enhances its performance. For more information on WCDA, refer to the Institution section of this evaluation.

Consumer. The bank's consumer lending to low- and moderate-income borrowers is good. The following tables show the bank's consumer lending by product for each year. Aggregate lending data is not available for consumer loans.

2016 Consumer Loan Distribution by Income Level of Borrower Riverton Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	272	6.6	5.6	26.8
Moderate	7	318	11.5	6.6	21.5
Middle	19	1,346	31.1	27.9	20.7
Upper	30	2,856	49.2	59.2	31.0
Unknown	1	30	1.6	0.6	0.0
Total	61	4,822	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	44	583	21.7	12.4	27.8
Moderate	40	831	19.7	17.7	19.8
Middle	59	1,358	29.1	29.0	18.7
Upper	59	1,889	29.1	40.3	33.7
Unknown	1	26	0.5	0.6	0.0
Total	203	4,687	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	42	359	22.2	11.0	27.8
Moderate	33	502	17.5	15.3	19.8
Middle	49	745	25.9	22.7	18.7
Upper	61	1,610	32.3	49.2	33.7
Unknown	4	59	2.1	1.8	0.0
Total	189	3,275	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	12	24	33.3	7.0	27.8
Moderate	4	24	11.1	7.0	19.8
Middle	9	187	25.0	54.5	18.7
Upper	8	74	22.2	21.6	33.7
Unknown	3	34	8.3	9.9	0.0
Total	36	343	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	102	1,238	20.9	9.4	NA
Moderate	84	1,675	17.2	12.8	NA
Middle	136	3,636	27.8	27.7	NA
Upper	158	6,429	32.3	49.0	NA
Unknown	9	149	1.8	1.1	NA
Total	489	13,127	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Riverton Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	9	460	11.5	5.9	23.9
Moderate	18	1,463	23.1	18.9	20.5
Middle	20	2,012	25.6	26.0	22.4
Upper	30	3,792	38.5	49.0	33.1
Unknown	1	12	1.3	0.2	0.0
Total	78	7,739	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	28	379	22.8	12.6	27.8
Moderate	24	463	19.5	15.4	17.1
Middle	24	653	19.5	21.8	19.2
Upper	47	1,507	38.2	50.2	35.9
Unknown	0	0	0.0	0.0	0.0
Total	123	3,002	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	34	235	23.0	10.1	27.8
Moderate	28	316	18.9	13.6	17.1
Middle	32	645	21.6	27.8	19.2
Upper	49	1,019	33.1	44.0	35.9
Unknown	5	103	3.4	4.4	0.0
Total	148	2,318	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	16	73	38.1	23.9	27.8
Moderate	6	50	14.3	16.3	17.1
Middle	11	80	26.2	26.1	19.2
Upper	8	100	19.0	32.7	35.9
Unknown	1	3	2.4	1.0	0.0
Total	42	306	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	87	1,147	22.3	8.6	NA
Moderate	76	2,292	19.4	17.1	NA
Middle	87	3,390	22.3	25.4	NA
Upper	134	6,418	34.3	48.0	NA
Unknown	7	118	1.8	0.9	NA
Total	391	13,365	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank's overall lending to low-income borrowers was below demographics and slightly below demographics for moderate-income borrowers. The bank's performance in lending to low- and moderate-

income borrowers was typically below demographics for all products, except other-unsecured loans. For this product, the bank's lending to low-income borrowers exceeded demographics.

In 2017, the bank's overall lending to low-income borrowers was somewhat below demographics but above demographics to moderate-income borrowers. By product level, the bank's performance was generally below demographics for low-income borrowers and slightly exceeded demographics for moderate-income borrowers, with the exception of other-unsecured loans. For this product, the bank's lending to low-income borrowers exceeded demographics and its lending to moderate-income borrowers was slightly below demographics.

In both years, the bank's lowest level of lending to low- and moderate-income borrowers was in the home equity category. However, the lending increased in 2017 from 2016. The bank's home equity lending performance is reasonable, given the affordable housing issues in the assessment area. With respect to home equity loans, as previously mentioned in this evaluation, low- and moderate-income individuals may have difficulty purchasing a home and, in addition, may also lack sufficient equity for the these types of loans.

The bank continues to offer small-dollar consumer loans. In 2016, the bank originated 12.1% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 72.9% were to low- and moderate-income borrowers. In 2017, the bank originated 11.0% of all consumer loans in the assessment area for \$3,000 or less. Of these small-dollar consumer loans, 79.1% were to low- and moderate-income borrowers. Originating small-dollar consumer loans indicates a willingness to meet the credit needs of the low- and moderate-income borrowers in the assessment area. Finally, bank management indicated banks in Fremont County are very competitive for consumer loans.

Small Business. The distribution of small business loans among businesses of different sizes is excellent. The following table shows the small business and small farm loan data by revenue and loan size for 2016 and 2017, respectively.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Riverton

Product Type	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
	2017					2016					2017								
	Bank		Total Businesses		Count	Bank		Dollar			Bank		Dollar						
	Count	Dollar	%	%		Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	91	67.9%	\$5,657	40.8%	88.6%	65	61.3%	48.3%	\$3,414	32.4%	40.0%	91	67.9%	53.3%	\$5,657	40.8%	40.6%
		Over \$1 Million	35	26.1%	\$7,892	56.9%	9.6%	33	31.1%					35	26.1%				
		Total Rev. available	126	94.0%	\$13,549	97.7%	98.2%	98	92.4%					126	94.0%				
		Rev. Not Known	8	6.0%	\$324	2.3%	1.7%	8	7.5%					8	6.0%				
		Total	134	100.0%	\$13,873	100.0%	100.0%	106	100.0%					134	100.0%				
	Loan Size	\$100,000 or Less	102	76.1%	\$4,146	29.9%		80	75.5%	93.9%	\$2,688	25.5%	41.3%	102	76.1%	92.4%	\$4,146	29.9%	44.2%
		\$100,001 - \$250,000	17	12.7%	\$2,844	20.5%		15	14.2%	3.4%	\$2,254	21.4%	14.6%	17	12.7%	4.2%	\$2,844	20.5%	17.5%
		\$250,001 - \$1 Million	15	11.2%	\$6,883	49.6%		11	10.4%	2.7%	\$5,602	53.1%	44.1%	15	11.2%	3.4%	\$6,883	49.6%	38.3%
		Total	134	100.0%	\$13,873	100.0%		106	100.0%	100.0%	\$10,544	100.0%	100.0%	134	100.0%	100.0%	\$13,873	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	78	85.7%	\$2,756	48.7%													
		\$100,001 - \$250,000	9	9.9%	\$1,422	25.1%													
		\$250,001 - \$1 Million	4	4.4%	\$1,479	26.1%													
		Total	91	100.0%	\$5,657	100.0%													
Small Farm	Revenue	\$1 Million or Less	157	96.9%	\$13,227	94.5%	99.4%	143	89.9%	81.7%	\$8,777	87.3%	87.3%	157	96.9%	87.1%	\$13,227	94.5%	91.4%
		Over \$1 Million	2	1.2%	\$702	5.0%	0.6%	7	4.4%					2	1.2%				
		Total Rev. available	159	98.1%	\$13,929	99.5%	100.0%	150	94.3%					159	98.1%				
		Not Known	3	1.9%	\$73	0.5%	0.0%	9	5.7%					3	1.9%				
		Total	162	100.0%	\$14,002	100.0%	100.0%	159	100.0%					162	100.0%				
	Loan Size	\$100,000 or Less	121	74.7%	\$4,842	34.6%		133	83.6%	84.5%	\$4,782	47.6%	45.4%	121	74.7%	79.3%	\$4,842	34.6%	37.5%
		\$100,001 - \$250,000	26	16.0%	\$4,243	30.3%		21	13.2%	11.4%	\$3,630	36.1%	31.9%	26	16.0%	12.9%	\$4,243	30.3%	28.2%
		\$250,001 - \$500,000	15	9.3%	\$4,917	35.1%		5	3.1%	4.1%	\$1,637	16.3%	22.7%	15	9.3%	7.8%	\$4,917	35.1%	34.3%
		Total	162	100.0%	\$14,002	100.0%		159	100.0%	100.0%	\$10,049	100.0%	100.0%	162	100.0%	100.0%	\$14,002	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	118	75.2%	\$4,769	36.1%													
		\$100,001 - \$250,000	26	16.6%	\$4,243	32.1%													
		\$250,001 - \$500,000	13	8.3%	\$4,215	31.9%													
		Total	157	100.0%	\$13,227	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

The bank originated 61.3% and 67.9% of its small business loans to small businesses in 2016 and 2017, respectively. According to D&B data, 88.6% of businesses in the assessment area had gross annual revenues of \$1 million or less in 2017, and 90.0% in 2016. While the bank's lending was below demographics, its performance exceeded aggregate lenders, by number of loans, each year. The bank's lending performance is excellent because it competes against many institutions, including national credit card lenders, and still performs favorably to aggregate reporters. The bank makes loans in varying sizes. The majority of small business loans to small businesses were for amounts of \$100,000 or less. While the bank may be somewhat below aggregate lenders in that loan size, this is reasonable since several large reporters are credit card lenders. Typically, small businesses will utilize credit cards for small-dollar loans. As loan sizes increase, the bank exceeds aggregate lenders.

Small Farm. The distribution of small farm loans among farms of different sizes is good. The bank originated 89.9% and 96.9% of its small farm loans to small farms in 2016 and 2017, respectively. According to D&B data, 99.4% of farms in the assessment area had gross annual revenues of \$1 million or less in 2017, with 100.0% in 2016. The bank was first in market share and exceeded aggregate lenders both years. However, a comparison to aggregate lending data in either year is not meaningful, because the bank is the leading small farm lender in this market and originated over 70% of the small farm loans reported in the assessment area. The majority of the bank's small farm loans to small farms were for amounts of \$100,000 or less. This performance indicates a willingness to meet the credit needs of small farms, as smaller operations tend to request smaller-dollar loans. Bank management indicated that competition for agricultural loans in this assessment area is aggressive. Further, agricultural producers

have focused on reducing expenses rather than growth. Given the performance context, the bank's performance is good.

Geographic Distribution

Overall, the geographic distribution and dispersion of the bank's HMDA, consumer, small business, and small farm loans in the Riverton assessment area is good and does not reveal any unexplained gaps in lending. In 2017, the assessment area had two moderate-income census tracts, both of which were in the reservation. This is a change from 2016, when the assessment area had five moderate-income tracts, three of which were in the reservation. In 2017, middle-income tracts comprised the majority (80.0%) of tracts. In 2016, the branches were located in moderate-income tracts. Based on 2017 FFIEC adjusted census data, the branches are now located in middle-income tracts. The Riverton branch is located less than one mile from a moderate-income tract. Finally, the Riverton branch is on the reservation, and the Lander branch is less than two miles away. The bank made loans in all moderate-income tracts in 2016 and 2017. During the evaluation period, the bank originated at least one loan in all tracts in the assessment area.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. At the loan product level, examiners did not evaluate the bank's home improvement or multifamily loans because of limited lending for this product type. The following table shows the bank's HMDA data by census tract income level and product type for 2016 and 2017.

Geographic Distribution of HMDA Loans

Assessment Area: Riverton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	12	15.2%	\$1,235	8.8%	19.5%	31	39.7%	40.4%	\$4,583	32.1%	36.0%	12	15.2%	13.8%	\$1,235	8.8%	10.1%
	Middle	67	84.8%	\$12,760	91.2%	80.5%	47	60.3%	59.6%	\$9,682	67.9%	64.0%	67	84.8%	86.2%	\$12,760	91.2%	89.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	79	100.0%	\$13,995	100.0%	100.0%	78	100.0%	100.0%	\$14,265	100.0%	100.0%	79	100.0%	100.0%	\$13,995	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	16.7%	\$588	8.4%	19.5%	18	27.7%	35.6%	\$2,699	23.1%	28.4%	5	16.7%	11.9%	\$588	8.4%	8.4%
	Middle	25	83.3%	\$6,417	91.6%	80.5%	47	72.3%	64.4%	\$8,979	76.9%	71.6%	25	83.3%	88.1%	\$6,417	91.6%	91.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	30	100.0%	\$7,005	100.0%	100.0%	65	100.0%	100.0%	\$11,678	100.0%	100.0%	30	100.0%	100.0%	\$7,005	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	16.7%	\$146	20.7%	19.5%	7	50.0%	44.7%	\$169	23.7%	25.8%	2	16.7%	12.0%	\$146	20.7%	7.0%
	Middle	10	83.3%	\$560	79.3%	80.5%	7	50.0%	55.3%	\$544	76.3%	74.2%	10	83.3%	88.0%	\$560	79.3%	93.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$706	100.0%	100.0%	14	100.0%	100.0%	\$713	100.0%	100.0%	12	100.0%	100.0%	\$706	100.0%	100.0%
MULTI FAMILY	Multi-Family Units					0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	50.0%	\$0	0.0%	22.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	50.0%	\$175	100.0%	77.4%	2	100.0%	100.0%	\$947	100.0%	100.0%
	Middle	2	100.0%	\$947	100.0%	85.5%	1	100.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$947	100.0%	100.0%	1	100.0%	100.0%	\$175	100.0%	100.0%	2	100.0%	100.0%	\$947	100.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	19	15.4%	\$1,969	8.7%	19.5%	56	35.4%	38.5%	\$7,451	27.8%	32.1%	19	15.4%	13.0%	\$1,969	8.7%	9.3%
	Middle	104	84.6%	\$20,684	91.3%	80.5%	102	64.6%	61.5%	\$19,380	72.2%	67.9%	104	84.6%	87.0%	\$20,684	91.3%	90.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	123	100.0%	\$22,653	100.0%	100.0%	158	100.0%	100.0%	\$26,831	100.0%	100.0%	123	100.0%	100.0%	\$22,653	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

In 2016, the bank’s HMDA lending in moderate-income tracts was slightly below aggregate lenders. According to 2016 FFIEC adjusted census data, 44.4% of the families in the assessment area resided in moderate-income tracts. In addition, 41.6% of owner-occupied units in the assessment area were located in moderate-income tracts. The bank’s lending performance in moderate-income tracts was below demographics. HMDA lending opportunities in the moderate-income tracts were somewhat limited, as 29.8% of housing units in these tracts were rental units and 12.7% were vacant units.

In 2017, the bank’s HMDA lending in moderate-income tracts slightly exceeded aggregate lenders. According to 2017 FFIEC adjusted census data, 21.2% of families resided in moderate-income tracts. In addition, 19.5% of owner-occupied units were located in moderate-income tracts. The bank’s lending performance in moderate-income tracts was below demographics. HMDA lending opportunities in the moderate-income tracts were somewhat limited, as 30.4% of the housing units were rental units and 9.3% were vacant units. The decline in the level of the bank’s lending in moderate-income tracts from 2016 to 2017 is explained by the reduction in the number of moderate-income tracts during that period.

The bank made HMDA loans in all moderate-income tracts in 2016, and most of this lending was in the tracts that include or are adjacent to the bank’s branches. Similarly, in 2017, the bank made HMDA loans in both moderate-income tracts; most of this lending was in the tract near its Riverton branch.

Consumer. The geographic distribution of the bank’s consumer loans is good. The tables below show the geographic distribution of the bank’s 2016 and 2017 consumer loans. Aggregate lending data is not available for consumer loans.

2016 Consumer Loan Distribution by Income Level of Geography Riverton Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	21	1,798	34.4	37.3	41.6
Middle	40	3,024	65.6	62.7	58.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	61	4,822	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	74	1,539	36.5	32.8	45.6
Middle	129	3,148	63.5	67.2	54.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	203	4,687	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	81	1,174	42.9	35.8	45.6
Middle	108	2,101	57.1	64.2	54.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	189	3,275	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	11	52	30.6	15.2	45.6
Middle	25	291	69.4	84.8	54.4
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	36	343	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	187	4,563	38.2	34.8	NA
Middle	302	8,564	61.8	65.2	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	489	13,127	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

In 2016, the bank’s lending performance in the moderate-income census tracts was below demographics. In 2016, 45.6% of households resided in the moderate-income tracts, and 53.7% of these households were

low or moderate income. In addition, 18.3% of the households in the moderate-income tracts live below the poverty level. Many of these households would likely not be able to afford a consumer loan.

2017 Consumer Loan Distribution by Income Level of Geography Riverton Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	12	1,020	15.4	13.2	19.5
Middle	66	6,719	84.6	86.8	80.5
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	78	7,739	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	26	686	21.1	22.9	20.8
Middle	97	2,316	78.9	77.1	79.2
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	123	3,002	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	45	496	30.4	21.4	20.8
Middle	103	1,822	69.6	78.6	79.2
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	148	2,318	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	9	37	21.4	12.1	20.8
Middle	33	269	78.6	87.9	79.2
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	42	306	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	92	2,239	23.5	16.8	NA
Middle	299	11,126	76.5	83.2	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	391	13,365	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2017, the bank's lending performance in the moderate-income census tracts was generally consistent with but at times above or below demographics. In 2017, 20.8% of households resided in moderate-income tracts and 53.3% of these households were low or moderate income. In addition, 18.1% of the

households in the moderate-income tracts lived below the poverty level. Many of these households would likely not be able to afford a consumer loan.

The bank originated a consumer loan in each moderate-income tract for each year of the evaluation period. Most of the bank’s consumer lending was in tract 9403.00, which is in Riverton and near the bank’s branch.

The following table shows the geographic distribution of the bank’s small business and small farm loans, as well as aggregate lending data for 2016 and 2017.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: Riverton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank		Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	25	18.7%	\$2,496	18.0%	14.0%	41	38.7%	40.2%	\$4,391	41.6%	38.8%	25	18.7%	13.0%	\$2,496	18.0%	17.5%
	Middle	109	81.3%	\$11,377	82.0%	86.0%	65	61.3%	51.5%	\$6,153	58.4%	56.4%	109	81.3%	81.1%	\$11,377	82.0%	78.6%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	8.2%	\$0	0.0%	4.8%	0	0.0%	5.9%	\$0	0.0%	3.9%
	Total	134	100.0%	\$13,873	100.0%	100.0%	106	100.0%	100.0%	\$10,544	100.0%	100.0%	134	100.0%	100.0%	\$13,873	100.0%	100.0%
SMALL FARM																		
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	37	22.8%	\$2,958	21.1%	14.2%	43	27.0%	22.4%	\$2,027	20.2%	15.9%	37	22.8%	19.8%	\$2,958	21.1%	18.4%
	Middle	125	77.2%	\$11,044	78.9%	85.8%	116	73.0%	75.8%	\$8,022	79.8%	82.9%	125	77.2%	77.9%	\$11,044	78.9%	80.1%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	1.5%
Total	162	100.0%	\$14,002	100.0%	100.0%	159	100.0%	100.0%	\$10,049	100.0%	100.0%	162	100.0%	100.0%	\$14,002	100.0%	100.0%	

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business. The geographic distribution of small business loans is good. In 2016, the bank was comparable to aggregate lenders and below demographics with its small business lending in moderate-income tracts. According to 2016 D&B data, 44.8% of small businesses were located in the moderate-income tracts. In 2017, the bank exceeded aggregated lenders and demographics with its small business lending in moderate-income tracts. According to 2017 D&B data, 14.0% of small businesses were located in the moderate-income tracts.²⁵

In 2016, the bank originated a small business loan in all moderate-income tracts but one. Specifically, the bank did not extend a small business loan in tract 9401.00; one of the bank’s primary competitors has an office in Fort Washakie, Wyoming, which is in this tract. As mentioned, the bank’s branches are in Riverton and Lander. In 2017, the bank originated small business loans in both moderate-income tracts, including several loans in tract 9401.00. Most of the bank’s small business lending in moderate-income tracts was in tract 9403.00, which is in Riverton, and near the bank’s branch. As mentioned, the bank competes with many institutions for small business loans in this assessment area. While the bank is the leading small business lender in this market, it originated less than 20.0% of all small business loans reported in the assessment area in both years, combined. Finally, the bank originated significantly more HMDA loans than small business loans by dollar amount. Overall, the bank’s performance is good.

Small Farm. The geographic distribution of small farm loans is good. The bank originated 27.0% of its small farm loans in moderate-income tracts in 2016 and 22.8% in 2017. The bank’s lending in the

²⁵ Three census tracts changed from moderate- to middle-income in 2017, which helps explain the change in D&B demographics.

moderate-income tracts was comparable to demographics in 2016, and exceeded demographics in 2017. According to D&B data, 27.5% of small farms were located in the moderate-income tracts in 2016 and 14.2% in 2017.²⁶ The bank was first in market share and exceeded aggregate lenders both years. However, a comparison to aggregate lending data in either year is not meaningful, because the bank is the leading small farm lender in this market and originated over 70% of the small farm loans reported in the assessment area. The bank originated 43 of the 49 small farm loans that aggregate lenders made in 2016 in moderate-income tracts. Similarly, the bank originated 37 of the 43 small farm loans made in moderate-income tracts in 2017.

In 2016, the bank made small farm loans in three of the five moderate-income tracts; the bank did not make small farm loans in tracts 4.00 and 9405.00. Tract 4.00 is in the northwestern corner of the county and is closer to Jackson Hole than Riverton or Lander, where the bank’s branches are located. National forestland is in much of this tract. Tract 9405.00 is in the city limits of Riverton, which limited small farm lending opportunities. The bank made small farms loans in both moderate-income tracts in 2017.

Community Development Lending

The bank is a leader in making community development loans in the Riverton assessment area. It originated three community development loans, totaling nearly \$3.7 million dollars, as shown in the table at right. A community contact stated that economic development opportunities are extremely limited, and there is a shortage of affordable housing, especially on the reservation.

Community Development Lending in the Riverton Assessment Area		
<i>Purpose</i>	<i>#</i>	<i>\$</i>
Affordable Housing	2	1,135,000
Community Service	1	2,525,000
Total	3	3,660,000

The bank originated a large community development loan that helped construct a 24-hour childcare center on the reservation near a local casino. Affordable childcare for tribal members and casino employees, was a critical need so they could work shifts throughout the entire day. This loan is highly responsive to unique needs in the assessment area. The remaining two community development loans were for affordable housing purposes, including a LIHTC project. Affordable housing is also an important need in the assessment area. Combined, the two projects created 32 additional affordable housing units, including many single-family homes for tribal housing.

INVESTMENT TEST

Overall, the bank made a significant level of qualified community development investments and grants, which exhibits good responsiveness to the credit and community needs in the Riverton assessment area. The level of the bank’s qualified investments in the form of securities is adequate. The bank holds one prior-period bond for \$35,000 and two prior-period bonds totaling \$70,000 that matured during the evaluation period.

The bank made a significant level of qualified investments in the form of donations, as shown in the table at right. The majority of donations focus on

Qualified Investment Donations in the Riverton Assessment Area		
<i>First Interstate Bank</i>	<i>#</i>	<i>\$</i>
Affordable Housing	2	7,500
Community Service	17	29,530
Total	19	37,030
<i>Foundation</i>	<i>#</i>	<i>\$</i>
Affordable Housing	1	2,500
Community Service	17	3,302
Revitalize and Stabilize	1	1,000
Total	19	6,802
Grand Total	38	43,832

²⁶ Three census tracts changed from moderate- to middle-income in 2017, which helps explain the change in D&B demographics.

community services targeted to low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to those in need, including developmental services for children, support for disabled individuals, food, and career training. The bank also made several donations to an organization that supports affordable housing, which is needed in the assessment area.

SERVICE TEST

The bank’s delivery systems are readily accessible to residents and businesses throughout the assessment area, and services do not vary in a way that inconveniences particular individuals or areas. The bank provides a relatively high level of community development services.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different income levels. The bank’s services do not vary in a way that inconveniences certain individuals or areas. The bank operates two full-service branches in Lander and Riverton. The branch in Lander has a deposit-taking ATM and a drive-up window. The Riverton branch does not have an ATM, but it operates a stand-alone drive-up facility across the street, with a deposit-taking ATM and weekend hours. In 2016, the branches and the drive-up facility were located in moderate-income tracts; the income designations of these tracts changed based on 2017 FFIEC adjusted census data. As of 2017, the branches and drive-up facility are located in middle-income tracts. The Riverton branch and drive-up facility are located less than one mile from a moderate-income tract. Finally, the Riverton branch and drive-up facility are in the reservation, and the Lander branch is less than two miles away.

The bank provides reasonable means for customers to complete many types of banking activities outside of normal service hours. Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts, and apply for certain consumer loans.

The following table shows the geographic distribution of branches and ATMs in this assessment area.

Geographic Distribution of Branches & ATMS
Assessment Area: Riverton

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0	0			
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	20.0%	20.8%	14.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	3	100.0%	0	0	1	0	1	Total	2	100.0%	2	100.0%	0	0	0	0.0%	0	0	8	80.0%	79.2%	85.1%
DTO	1		0	0	1		1	SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	3	100.0%	0	0	1	0	1	Total	2	100.0%	2	100.0%	0	0	0	0.0%	0	0	10	100.0%	100.0%	100.0%
DTO	1		0	0	1		1	SA	0		0		0	0	0		0	0				

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides a relatively high level of community development services in the Riverton assessment area. Thirteen bank employees provided 26 community development services during the evaluation period for four different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as teaching financial literacy to children. The bank also provided services to organizations that promote affordable housing, which is responsive to area needs. Bank employees served as board members and presenters.

Community Development Services in the Riverton Assessment Area	
<i>Purpose</i>	#
Community Services	21
Affordable Housing	2
Revitalization and Stabilization	3
Total	26

METROPOLITAN AREA LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CASPER, WYOMING, MSA 16220 ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Casper MSA assessment area. Examiners did not include the bank’s small farm loans in the analysis, because it is not a major business line for this assessment area. Examiners determined the bank’s lending performance in this assessment area is consistent with the performance in the full-scope metropolitan assessment area. The bank’s investment and service performance in this assessment area exceeds the performance in the full-scope metropolitan area. The bank’s level of donations is excellent and the bank provided a relatively high level of community development services in this assessment area. This performance does not change the conclusion for the metropolitan portion of the state.

This assessment area consists of Natrona County and is in the middle of the state. In 2016, the assessment area included four moderate-, nine middle-, and five upper-income census tracts. The income classifications for the tracts changed in 2017, which are noted in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 80,011.²⁷

The bank operates three full-service branches with cash-dispensing-only ATMs, and one stand-alone drive-up facility that has a cash-dispensing-only ATM. Two offices have attached drive-up facilities, which offer extended weekday hours. The stand-alone drive-up offers extended weekday and weekend hours. The bank closed a branch at a grocery store in March 2016. The offices are located in the communities of Casper (two) and Mills (one). One office and the stand-alone drive-up facility are located in the low-income census tract; the other two offices are located in a moderate-income tract and a middle-income tract.

The following table provides information regarding the demographic characteristics of the assessment area based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Casper Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	1	5.6	5.4	21.1
Moderate Income	3	16.7	10.2	16.4
Middle Income	11	61.1	68.5	21.7
Upper Income	3	16.7	15.9	40.7
Total	18	100.0	100.0	100.0

²⁷ The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data; it also reflects changes from the 2017 OMB-revised MSA delineations.

The following table shows the bank’s lending activity in the assessment area during the evaluation period.²⁸

Lending Activity in the Casper Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	305	336	641
Small Farm	19	12	31
HMDA	503	443	946
Consumer	661	535	1,196
Total	1,488	1,326	2,814

By number, the Casper MSA assessment area accounts for 6.1% of the bank’s overall lending during the evaluation period and 21.0% of the bank’s lending activity in the Wyoming assessment areas. In 2017, the bank ranked 1st among 50 aggregate lenders reporting small business and small farm loans in the assessment area. The bank extended 17.9% of small business and small farm loans reported in 2017. The bank also ranked 2nd for small business and small farm lending in 2016. For HMDA loans, the bank ranked 2nd of 140 and 1st of 147 aggregated lenders for 2016 and 2017, respectively. The bank accounted for 15.5% of the HMDA lending in 2017 and 15.0% in 2016 in the assessment area.

The bank’s community development lending in the Casper assessment area is noteworthy. The bank originated \$5.9 million that supported economic development activities, helped revitalize and stabilize a low-income area, and provided affordable housing for low- and moderate-income residents.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF WYOMING

The facts and data examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section at the beginning of this evaluation shows the bank’s community development lending and qualified investments for each assessment area. Conclusions regarding performance of the limited-scope assessment area, which did not affect the state rating, are shown in the following table.

Performance in the Limited-Scope Review Wyoming MSA Assessment Area			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Casper MSA	Consistent	Exceeds	Exceeds

²⁸ For the limited-scope assessment areas, Appendix D provides information regarding the borrower and geographic distribution of loans as well as aggregate lender data and demographics.

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE JACKSON, WYOMING, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Jackson assessment area. Examiners did not evaluate the bank’s small farm lending because it is not a material product line for this assessment area. Examiners determined the bank’s lending performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan assessment area. The bank’s investment performance exceeds the performance in the full-scope assessment area. The bank holds eight investments in the form of securities, totaling \$3.9 million, in this assessment area. The bank’s service performance is below the performance in the full-scope nonmetropolitan assessment area. The bank provided few community development services in this assessment area. This performance does not change the conclusion for the nonmetropolitan portion of the state.

This assessment area consists of Teton County in northwest Wyoming. In 2016, the assessment area included one middle-income and three upper-income census tracts. The income classifications for the tracts changed in 2017, which are noted in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 22,311.

The bank operates three full-service branches with ATMs in the assessment area (two of these ATMs are deposit-taking). One office has a drive-up facility with weekend and extended hours; another office is located in a grocery store and offers extended hours. The bank also operates three stand-alone ATMs in the assessment area, one of which is deposit-taking.

The following table provides information regarding the demographic characteristics of the assessment area based on 2017 FFIEC adjusted census data.²⁹

Assessment Area Demographics – Jackson Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	0	0.0	0.0	10.4
Moderate Income	0	0.0	0.0	12.5
Middle Income	2	50.0	48.9	22.3
Upper Income	2	50.0	51.1	54.8
Total	4	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

²⁹ The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data.

Lending Activity in the Jackson Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	114	99	213
Small Farm	1	2	3
HMDA	150	68	218
Consumer	144	152	296
Total	409	321	730

By number, the Jackson assessment area accounts for 1.6% of the bank’s overall lending during the evaluation period and 5.5% of the bank’s lending activity in the Wyoming assessment areas. In 2017, the bank ranked 5th among 48 aggregate lenders reporting small business and small farm loans in the assessment area.³⁰ The bank extended 6.6% of small business and small farm loans reported in 2017. The bank also ranked 4th for small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st among 90 and 78 aggregate lenders in 2016 and 2017, respectively. The bank accounted for 11.8% of the HMDA lending in 2017 and 18.6% in 2016 in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LARAMIE, WYOMING, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Laramie assessment area. Examiners did not include the bank’s small farm lending in the analysis because it is not a major business line for this assessment area. They determined the bank’s lending and service performance in this assessment area are consistent with the performance in the full-scope nonmetropolitan area. The bank’s investment performance is below the performance in the full-scope nonmetropolitan area. The bank made a low level of community development donations and did not purchase any qualified investments in the form of securities, nor did it continue to hold any prior-period investments in this assessment area. This performance does not change the conclusion for the nonmetropolitan portion of the state.

This assessment area consists of Albany County. Its southern border lies on the northern Colorado state line. In 2016, the assessment area included one low-, three moderate-, four middle-, and two upper-income census tracts. The income classifications for the tracts changed in 2017, which are noted in the table below. All middle-income census tracts (seven total) were considered distressed in 2017. According to 2017 FFIEC adjusted census data, the population of the assessment area is 37,565.

The bank has one branch in this assessment area, located in a moderate-income census tract. During the evaluation period, the bank closed a limited-service branch and three ATMs at a local university. The bank still has a deposit-taking ATM at the university.

The following table provides information regarding the demographic characteristics of the assessment area based on 2017 FFIEC adjusted census data.

³⁰ Only eight small farm loans were reported in the assessment area in 2017, and only nine were reported in 2016.

Assessment Area Demographics – Laramie Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	2	20.0	7.0	26.7
Moderate Income	1	10.0	6.5	16.5
Middle Income	7	70.0	86.6	21.1
Upper Income	0	0.0	0.0	35.7
Total	10	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Laramie Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	162	153	315
Small Farm	31	22	53
HMDA	146	133	279
Consumer	236	149	385
Total	575	457	1,032

By number, the Laramie assessment area accounts for 2.2% of the bank’s overall lending during the evaluation period and 7.7% of the bank’s lending activity in the Wyoming assessment areas. In 2017, the bank ranked 1st among 33 aggregate lenders reporting small business and small farm loans in the assessment area. The bank extended 27.8% of small business and small farm loans reported in 2017. The bank also ranked 1st among 31 aggregate lenders for small business and small farm lending in 2016. For HMDA loans, the bank ranked 2nd among 105 and 102 aggregate lenders in 2016 and 2017, respectively. The bank accounted for 13.0% of the HMDA lending in 2017 and 2016 in the assessment area.

The bank’s community developing lending in the Laramie assessment area is noteworthy. The bank made nine loans totaling \$8.7 million. These loans financed affordable housing projects and other developments that revitalized and stabilized the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SHERIDAN, WYOMING, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Sheridan assessment area. Examiners did not evaluate the bank’s small farm lending because it was not a material product line for this assessment area. They determined the bank’s lending performance in this assessment area is consistent with the performance in the full-scope nonmetropolitan area. The investment performance exceeds the performance in the full-scope nonmetropolitan area. The bank made an excellent level of community development donations in this assessment area. The service performance in this assessment area is below the performance in the full-scope nonmetropolitan area; the bank provided an adequate level of community development services in the Sheridan assessment area. This performance does not change the conclusion for the nonmetropolitan portion of the state.

The assessment area consists of Sheridan, Johnson, and Campbell counties in north-central Wyoming. In 2016, the assessment area included 1 moderate-, 12 middle-, and 2 upper-income census tracts. The income classifications for the tracts changed in 2017, which are noted in the table below. According to 2017 FFIEC adjusted census data, the population of the assessment area is 86,351.

The bank operates five full-service branches with deposit-taking ATMs in the communities of Buffalo (one), Gillette (two), and Sheridan (two). All but the Sheridan downtown office have extended hours and weekend hours at their drive-up windows. A stand-alone drive-up facility, located a block from the downtown Sheridan office, has a deposit-taking ATM as well as weekend and extended hours. Since the previous evaluation, the bank moved the Gillette South Douglas Highway branch approximately a half-mile south from its previous location on the same street.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Sheridan Assessment Area				
Income Category	Tract Distribution		Percentage of Families by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	16.7
Moderate Income	0	0.0	0.0	16.0
Middle Income	11	73.3	64.7	22.4
Upper Income	4	26.7	35.3	44.9
Total	15	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Sheridan Assessment Area			
Loan Type	2016	2017	Total
Small Business	380	370	750
Small Farm	43	46	89
HMDA	482	447	929
Consumer	1,645	1,511	3,156
Total	2,550	2,374	4,924

By number, the Sheridan assessment area accounts for 10.6% of the bank’s overall lending during the evaluation period and 36.8% of the bank’s lending activity in the Wyoming assessment areas. In 2017, the bank ranked 1st among 55 aggregate lenders reporting small business and small farm loans in the assessment area. The bank extended 16.7% of small business and small farm loans reported in 2017. The bank ranked 2nd among 46 reporters for small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st among 128 aggregate lenders in both 2016 and 2017. The bank accounted for 18.0% of the HMDA lending in 2017 and 16.2% in 2016 in the assessment area.

The bank’s community developing lending in the Sheridan assessment area is noteworthy. The bank made five loans totaling \$1.3 million. These loans financed affordable housing projects and other developments that helped organizations who serve low- and moderate-income people in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF WYOMING

The facts and data examiners reviewed, including performance and demographic information can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank’s community development lending and qualified investments for each assessment area. The Wyoming state section of the report also shows qualified investments in the form of donations and community development services for each assessment area. Conclusions regarding performance of the limited scope assessment areas, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan Montana Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Jackson	Consistent	Exceeds	Below
Laramie	Consistent	Below	Consistent
Sheridan	Consistent	Exceeds	Below

SOUTH DAKOTA

CRA RATING FOR SOUTH DAKOTA: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The bank's lending activity in the South Dakota assessment areas shows excellent responsiveness to local credit needs.
- The bank's lending to businesses and farms of different sizes and to low- and moderate-income borrowers is excellent overall.
- The bank's distribution of small farm, small business, HMDA, and consumer loans throughout the assessment areas is good.
- The bank made an adequate level of community development loans in its South Dakota assessment areas.
- The bank makes extensive use of flexible loan programs at its South Dakota branches.
- The bank has an adequate level of qualified investments by number and dollar amount. The qualified investment securities and donations show adequate responsiveness to credit and community development needs.
- The bank's retail services are readily accessible to businesses, farms, and residents throughout the South Dakota assessment areas, and the bank provides a relatively high level of community development services.

SCOPE OF EVALUATION

The scope of the CRA evaluation for South Dakota is consistent with the scope for the overall institution described earlier in the Institution section. Examiners completed a full-scope review for the Rapid City, SD MSA assessment area.

Examiners assessed the bank's performance using the following criteria: lending activity, lending to farms and businesses of different sizes and to borrowers of different income levels, geographic distribution of loans, community development lending, innovative and flexible lending practices, qualified investments, retail services, and community development services.

Examiners conducted limited-scope reviews for the Sioux Falls, SD MSA, Belle Fourche, and Edgemont assessment areas in South Dakota. Examiners evaluated whether the bank's performance in the limited-scope assessment areas was consistent with its performance in the full-scope assessment area. The limited-scope review of the Sioux Falls MSA assessment area was compared to the full-scope review of the Rapid City MSA assessment area, and the nonmetropolitan limited-scope reviews were compared with the state performance.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH DAKOTA

Assessment Area Information. For the majority of the evaluation period, the bank had three assessment areas in South Dakota. The bank closed its branch in Sioux Falls, which eliminated that assessment area as of mid-June 2016. Therefore, the Sioux Falls MSA assessment area is only being reviewed for 2016, and the review is based on a partial year of activity.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank had \$810.3 million in deposits in its South Dakota assessment areas, which is 11.1% of total bank deposits. According to the same report, the bank ranked 12th among the 83 FDIC-insured institutions in South Dakota, with 0.2% of the state's deposits. The bank operates in highly competitive assessment areas that include large national and regional banks, as well as credit unions. Two national banks hold 49.4% and 46.2% of the state's deposits, respectively. Credit unions are not captured in the market share report.

Based on 2017 FFIEC adjusted census data, the South Dakota assessment areas include 39 census tracts: 1 low-, 6 moderate-, 26 middle-, and 6 upper-income census tracts.³¹ This is a decrease in census tracts from the last evaluation due to the branch closure in June 2016 that eliminated the Sioux Falls MSA assessment area. None of the census tracts in the South Dakota assessment areas were classified as distressed or underserved during the evaluation period.

The bank's South Dakota assessment areas do not include any American Indian reservations; however, two reservations border portions of the bank's assessment areas. The Pine Ridge Indian Reservation is located east of the Edgemont assessment area and southeast of the Rapid City MSA assessment area. The Cheyenne River Indian Reservation borders the eastern portion of Meade County; this county is part of the Rapid City MSA assessment area. Meade County includes parcels of noncontiguous tribal trust land of the Cheyenne River Indian Reservation and the Northern Cheyenne Indian Reservation.

Population. According to 2017 FFIEC adjusted census data, the total population of South Dakota is 843,190, of which 182,703 reside in the assessment areas. The bank's South Dakota assessment areas include 21.7% of the state population.

General Economic and Housing Information. During the evaluation period, economic conditions were generally good and included some growth; however, agriculture throughout the state was impacted by low commodity prices. The primary industries in the bank's 2017 South Dakota assessment areas are agriculture, tourism, health care, and gaming, as well as federal, state, and local governments. Although tourism provides many employment opportunities in the bank's assessment areas, wages are generally low and many positions are seasonal. The health-care sector continues to expand as providers open new locations and expand services. The state's not seasonally adjusted annual average unemployment rate was 3.0% in 2016 and 3.2% in 2017, compared to the national unemployment rates of 4.9% and 4.4% for 2016 and 2017, respectively. Bank management and a community contact noted that low wages are a greater concern than unemployment.

Agricultural conditions are generally stable but are impacted by continued low commodity prices. The primary agricultural activity in the bank's assessment areas is cattle operations, which have not been affected as badly as farming.

Housing markets and conditions vary throughout the bank's South Dakota assessment areas; however, housing affordability continues to be a concern. The housing market is growing, and prices continue to increase.

According to 2017 FFIEC adjusted census data, the median housing value in the South Dakota assessment areas averaged \$155,483, with the lowest value at \$102,800 in Fall River County and the highest value at \$208,900 in Custer County. The median age of housing stock in the South Dakota assessment areas averaged 36 years, with the lowest median age of housing stock in Meade County at 30 years and the highest median age of housing stock in Butte and Fall River counties at 42 years.

³¹ The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

South Dakota has numerous financial institutions. Many large national and regional banks, as well as credit unions, operate throughout the state. Accordingly, competition for deposits, loans, and community development activities is strong in many assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

Examiners based the bank’s South Dakota evaluation on a full-scope review of the Rapid City MSA and limited-scope reviews of the remaining South Dakota assessment areas. A detailed discussion of the bank’s performance in the full-scope assessment area and shorter discussions of the limited-scope assessment areas follow this section. For the limited-scope reviews, Appendix D provides additional information regarding borrower and geographic distributions.

The overall CRA rating for South Dakota is satisfactory, based on the bank’s performance under the Lending, Investment, and Service tests.

The Lending Test rating is outstanding. The bank’s lending activity reflects excellent responsiveness to credit needs throughout the South Dakota assessment areas. The bank’s distribution of loans is excellent by revenue size and income of borrowers and good by geographic location of borrowers. In addition, the bank made an adequate level of community development loans. Finally, the bank makes extensive use of flexible loan programs in some of its assessment areas.

The Investment Test rating is low satisfactory. The bank holds an adequate level of qualified investments by number and dollar amount, which showed adequate responsiveness to credit and community development needs.

The Service Test rating is high satisfactory. Delivery systems are readily accessible to all portions of the South Dakota assessment areas. The bank has made some changes to branch and ATM locations during the evaluation period; however, these changes did not adversely affect the availability of retail services. The bank provides a relatively high level of community development services, and bank officers and employees support organizations dedicated to community development initiatives.

LENDING TEST

The Lending Test rating for South Dakota is outstanding.

Lending Activity

The bank’s lending levels reflect excellent responsiveness to credit needs in its South Dakota assessment areas. The table below shows the bank’s lending in its South Dakota assessment areas by product type for the two-year evaluation period.

Summary of Lending Activity in the South Dakota Assessment Areas				
<i>Loan Type</i>	<i>2016</i>			
	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
HMDA Home Purchase	292	61.2	61,173	63.2
HMDA Refinancing	137	28.7	30,151	31.2
HMDA Home Improvement	44	9.2	3,803	3.9
HMDA Multifamily	4	0.8	1,625	1.7
Total HMDA Related	477	9.5	96,752	37.8
Total Small Business Related	647	12.9	45,468	17.8
Total Small Farm	324	6.5	19,976	7.8

Summary of Lending Activity in the South Dakota Assessment Areas				
<i>Loan Type</i>	<i>2016</i>			
	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
Home Equity	265	7.4	22,437	23.9
Motor Vehicle	2,334	65.5	53,100	56.6
Other – Secured	891	25.0	15,328	16.3
Other - Unsecured	76	2.1	2,932	3.1
Total Consumer Related	3,566	71.1	93,797	36.6
Total Loans	5,014	100.0	255,993	100.0
	<i>2017</i>			
HMDA Home Purchase	217	67.8	39,891	69.2
HMDA Refinancing	73	22.8	13,901	24.1
HMDA Home Improvement	28	8.8	3,147	5.5
HMDA Multifamily	2	0.6	702	1.2
Total HMDA Related	320	7.6	57,641	29.7
Small Business	609	96.7	42,199	95.1
Small Business RRE Secured	21	3.3	2,172	4.9
Total Small Business Related	630	14.9	44,371	22.9
Total Small Farm	353	8.3	22,584	11.6
Home Equity	229	7.8	21,475	30.9
Motor Vehicle	1,374	46.8	29,894	43.0
Other - Secured	692	23.6	12,652	18.2
Other - Unsecured	640	21.8	5,553	8.0
Total Consumer Related	2,935	69.3	69,574	35.8
Total Loans	4,238	100.0	194,170	100.0
	<i>2016 – 2017</i>			
GRAND TOTALS	<i>#</i>	<i>%</i>	<i>\$(000)</i>	<i>%</i>
Total HMDA	797	8.6	154,393	34.3
Total Small Business	1,277	13.8	89,839	20.0
Total Small Farm	677	7.3	42,560	9.5
Total Consumer	6,501	70.3	163,371	36.3
Total All Loans	9,252	100.0	450,163	100.0

The South Dakota assessment areas account for 18.6% of the number and 12.0% of the dollar amount of the bank’s lending activity during the evaluation period. Small business and small farm lending remained stable throughout the evaluation period, while HMDA and motor vehicle–secured lending decreased. Bank management attributed the decline in HMDA lending to increasing interest rates.

In the areas served by the bank, the bank was typically among the leading lenders for small business, small farm, and HMDA loans. For small business and small farm loans, the bank was among the top 3 lenders for each year during the evaluation period in the Rapid City MSA and the nonmetropolitan assessment areas. Similarly, for HMDA loans, the bank was among the top 10 lenders for each year in the evaluation period in the Rapid City MSA and the nonmetropolitan assessment areas. The bank was not a leading HMDA, small business, or small farm lender in the Sioux Falls MSA.

The bank made extensive use of flexible lending programs for home mortgage loans to low- and moderate-income borrowers and for small farm loans and used a flexible lending program for consumers.

Refer to the Innovative and Flexible Lending Practices described previously in the Institution section for specific information.

Borrower and Geographic Distributions

Overall, the bank's distribution of loans among businesses and farms of different sizes and borrowers of different income levels in the South Dakota assessment areas is excellent. The bank extends loans to small businesses, small farms, and low- and moderate-income borrowers throughout the South Dakota assessment areas. In addition, the geographic distribution and dispersion of loans is good. The bank extends loans in most of the census tracts within the assessment areas, including the low- and moderate-income tracts.

For a detailed discussion of the borrower and geographic distribution of lending, see the Conclusions with Respect to Performance Tests in the Rapid City MSA assessment area section. The tables in Appendix D show the borrower and geographic distributions of the bank's loans, demographic characteristics, and aggregate lending data for the limited-scope assessment area reviews.

Community Development Loans

The bank made an adequate level of community development loans in the South Dakota assessment areas. It originated four community development loans totaling \$992,421, which supported affordable housing. The bank's community development lending is concentrated in certain assessment areas. By dollar amount of loans, the bank extended 72.9% and 27.1% of its community development loans in the Belle Fourche and Rapid City MSA assessment areas, respectively.

The bank's community development lending demonstrates adequate responsiveness to the needs of the assessment areas. All four of the community development loans in the South Dakota assessment areas financed multifamily affordable rental housing and helped address the need for affordable housing in the assessment areas.

Overall, the level of community development lending in the South Dakota assessment areas is adequate and is responsive to community credit needs.

INVESTMENT TEST

The bank's Investment Test rating for South Dakota is low satisfactory. The bank has an adequate level of qualified community development investments that demonstrate adequate responsiveness to credit and community development needs.

The bank held eight prior-period qualified investments totaling approximately \$3.2 million in the South Dakota assessment areas.³² The investments helped revitalize and stabilize underserved, distressed, and low- and moderate-income areas. These investments financed essential infrastructure in the Rapid City MSA, Belle Fourche, and Edgemont assessment areas, including schools, government buildings, and utilities. The bank also continued to hold seven prior-period investments totaling \$2.8 million that benefited the state of South Dakota, which supported economic development and revitalization and stabilization of underserved, distressed, and low- and moderate-income areas.

Because the bank's investment activities adequately address community development needs in its South Dakota assessment areas, examiners considered the bank's qualified South Dakota investments that were

³² Although FIB did not make any new investments during the evaluation period, total investments increased since the last evaluation because FIB identified prior period investments previously unreported.

outside its assessment areas. The bank held one prior-period qualified investment for \$750,000 that benefited areas of South Dakota outside its assessment areas. This investment supported economic development efforts.

Donations. The bank made an adequate level of donations during the evaluation period, totaling \$90,918, all of which directly benefited its assessment areas or a broader statewide area that includes its assessment areas. The South Dakota Qualified Investment Donations table shows the distribution of the donations by assessment area.

South Dakota Qualified Investment Donations						
<i>Assessment Area</i>	<i>Bank</i>		<i>Foundation</i>		<i>Total</i>	
	<i>#</i>	<i>\$</i>	<i>#</i>	<i>\$</i>	<i>#</i>	<i>\$</i>
Rapid City MSA	18	32,503	26	21,275	44	53,778
Belle Fourche	36	16,265	31	18,736	67	35,001
Edgemont	1	2,086	0	0	1	2,086
Sioux Falls MSA (2016 only)	0	0	0	0	0	0
State of SD/Regional	1	53	0	0	1	53
Grand Total	56	50,907	57	40,011	113	90,918

The bank’s donations supported numerous organizations in its South Dakota assessment areas. By dollar amount, the bank made 80.4% of donations to organizations that provide community services to low- and moderate-income individuals and 18.5% to organizations that promote affordable housing. The bank’s donations supported food shelves, medical care facilities, educational programs, and shelters for victims of abuse. The bank also supported an economic development initiative through its donations. Overall, the bank’s donations were adequately responsive to community needs.

In conclusion, the bank’s Investment Test rating for South Dakota is low satisfactory. The bank holds an adequate level of investments and donations in the South Dakota assessment areas, which is responsive to community needs.

SERVICE TEST

The Service Test rating for South Dakota is high satisfactory. Delivery systems are readily accessible to all portions of the South Dakota assessment areas, and branch hours and services do not vary in a way that inconveniences individuals or areas. Bank officers and employees provide a relatively high level of services to community development organizations in the South Dakota assessment areas.

Retail Banking Services

The bank’s delivery systems are readily accessible to all portions of the South Dakota assessment areas, and services do not vary in a way that inconveniences low- or moderate-income areas or individuals. In 2017, the bank operated 15 branches, one of which was a drive-up-only facility, as well as 20 ATMs in the state. In June 2016, the bank closed the limited-service branch in Sioux Falls, which was located in an upper-income census tract. The bank also closed one deposit-taking ATM located in the Rapid City MSA assessment area and one cash-dispensing-only ATM in the Belle Fourche assessment area; both ATMs were in middle-income tracts. The bank’s closure of the branch and ATMs does not appear to have adversely affected low- and moderate-income individuals or geographies.

The following table shows the bank’s distribution of branches and ATMs as of 2017.

Geographic Distribution of Branches & ATMS
Assessment Area: Assessment Group(s): South Dakota

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			#
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	2.6%	0.3%	0.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	6.7%	0	0	1	1	1	Total	5	25.0%	0	0.0%	0	0	5	26.3%	0	0	6	15.4%	12.7%	15.8%
DTO	0		0	0				SA	4		0		0	0	4		0	0				
Middle	11	73.3%	0	0	8	9	7	Total	12	60.0%	0	0.0%	0	1	12	63.2%	0	1	26	66.7%	68.8%	65.2%
DTO	1		0	0				SA	2		0		0	1	2		0	1				
Upper	3	20.0%	0	0	3	2	2	Total	3	15.0%	1	100.0%	0	0	2	10.5%	0	0	6	15.4%	18.2%	18.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	15	100.0%	0	0	12	12	10	Total	20	100.0%	1	100.0%	0	1	19	100.0%	0	1	39	100.0%	100.0%	100.0%
DTO	1		0	0				SA	6		0		0	1	6		0	1				

2017 FFIEC Census Data, 2017 D&B Infr and 2015 ACS Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

The branches are readily accessible to all portions of the bank’s assessment areas. In 2017, the bank had 73.3% of its branches in middle-income census tracts. This percentage is reasonable given that middle-income census tracts represent 66.7% of the census tracts in the South Dakota assessment areas. In addition, in 2017, the South Dakota assessment areas had only one low-income census tract and six moderate-income census tracts, which were all located in the Rapid City MSA. For the same year, the Rapid City MSA assessment area had one branch and two ATMs in moderate-income census tracts and a second branch in a tract that bordered two moderate-income tracts. In 2016, the Belle Fourche assessment area had a branch office close to a moderate-income tract; however, the income designation of the moderate-income tract changed to middle income in 2017. Although the bank does not have branches in all moderate-income census tracts, the branches near the moderate-income census tracts can reasonably serve residents of those tracts. The bank’s South Dakota assessment areas include only one low-income tract, which is located in the Rapid City MSA. While the bank does not have a branch office or limited-service facility in that tract, only 0.3% of households and 0.3% of total businesses are located in the tract. The tract includes an air force base and a credit union. Numerous financial institutions operate throughout the assessment areas that serve the low- and moderate-income tracts.

The bank offers the same products and services at each of its South Dakota locations. Most locations have extended weekday and weekend hours as well as drive-up facilities. Hours of operation at each branch are reasonable and do not vary in a way that inconveniences low- and moderate-income individuals or areas. In addition to the bank’s branches and ATMs, it offers telephone, online, and mobile banking services. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts, and apply for various consumer loans.

The bank’s delivery systems are readily accessible to all parts of the South Dakota assessment areas, including low- and moderate-income individuals or areas. Its services do not vary in a way that inconveniences particular individuals or areas. The bank offers reasonable service hours and alternative delivery systems.

Community Development Services

The bank provides a relatively high level of community development services in the South Dakota assessment areas. The table below shows the distribution of community development services by type of activity and assessment area.

South Dakota Community Development Services				
<i>Assessment Area/Region/State</i>	<i>Affordable Housing</i>	<i>Community Services</i>	<i>Economic Development</i>	<i>Total</i>
Rapid City MSA	4	17	1	22
Belle Fourche	0	26	0	26
Edgemont	2	10	0	12
Sioux Falls MSA (2016 only)	0	0	0	0
Regional SD	4	3	0	7
Statewide SD	0	2	3	5
Totals	10	58	4	72

Numerous bank employees provided financial expertise to organizations that support community development initiatives in South Dakota; these organizations provide community services, support economic development, and address affordable housing issues. Employees often held leadership positions, such as serving on a board of directors or committees. The bank staff also served organizations with a regional and statewide focus.

The bank actively provided services throughout its South Dakota assessment areas, with the exception of the Sioux Falls MSA, which is reasonable given the short period of time the branch was open during the evaluation period. The bank provided 36.1% and 30.6% of its community development services in the Belle Fourche and Rapid City MSA assessment areas, respectively. Bank employees in the Edgemont assessment provided 16.7% of community development services.

In conclusion, the Service Test rating in South Dakota is high satisfactory. Delivery systems are readily accessible. The closing of one limited-service branch in the Sioux Falls MSA did not adversely affect the accessibility of its delivery systems, particularly to low- and moderate-income geographies or individuals. The bank's services and hours do not vary in a way that inconveniences particular individuals or areas. Finally, the bank provides a relatively high level of community development services, which are responsive to community development needs in its assessment areas.

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RAPID CITY, SOUTH DAKOTA, MSA 39660 ASSESSMENT AREA

Bank Information. The bank currently operates seven full-service branches in the Rapid City MSA and one stand-alone drive-up facility. The branches are located in the communities of Rapid City, Custer, Hill City, New Underwood, Sturgis, and Wall. All of the branches have ATMs, and all except New Underwood have drive-up facilities. The bank also offers several additional cash-dispensing-only ATMs throughout the assessment area. See the Retail Services Test section for more details. By number, the bank has 9.9% of its offices, including branches and stand-alone drive-up facilities, in this assessment area.

According to the June 30, 2017, FDIC Deposit Market Share Report, the bank ranks 2nd among 12 FDIC-insured financial institutions operating in the Rapid City MSA, with a 19.0% deposit market share. The deposits in the Rapid City MSA assessment area, \$522.3 million, represent 7.2% of the bank's overall deposits. In addition to the local and national banks included in the FDIC's report, the bank faces competition from several credit unions and Farm Credit Services of America.

Assessment Area Information. The Rapid City MSA assessment area consists of Pennington, Meade, and Custer counties and is located on South Dakota's western border. This assessment area is adjacent to the Edgemont and Belle Fourche assessment areas. Rapid City is the second largest city in the state of South Dakota. It is also the county seat of Pennington County, and the majority (68.7%) of residents in the county live in Rapid City. The Pine Ridge and Cheyenne River Indian Reservations border the southeastern and northeastern portions of the assessment area, respectively. Meade County includes parcels of noncontiguous tribal trust land of the Cheyenne River Indian Reservation and the Northern Cheyenne Indian Reservation.

The bank has not changed this assessment area since the previous evaluation; however, the income classifications of some census tracts changed based on FFIEC 2017 adjusted census data. In 2016, the Rapid City MSA assessment area included 1 low-, 7 moderate-, 17 middle-, and 5 upper-income tracts. The following Combined Demographics Report provides demographic information for this assessment area, based on 2017 FFIEC adjusted census data and 2017 D&B data.³³

³³The FFIEC adjusted census data is based on decennial U.S. Census data and ACS five-year estimate data; it also reflects changes in the 2017 OMB-revised MSA delineations.

Combined Demographics Report

Assessment Area: Rapid City MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.3	188	0.5	75	39.9	7,034	19.2
Moderate-income	6	20.0	4,947	13.5	884	17.9	7,009	19.1
Middle-income	18	60.0	23,795	64.9	1,626	6.8	8,192	22.3
Upper-income	5	16.7	7,735	21.1	376	4.9	14,430	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	36,665	100.0	2,961	8.1	36,665	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	281	24	0.1	8.5	229	81.5	28	10.0
Moderate-income	10,179	4,542	11.8	44.6	4,824	47.4	813	8.0
Middle-income	39,119	25,060	64.9	64.1	10,604	27.1	3,455	8.8
Upper-income	12,783	8,972	23.2	70.2	1,767	13.8	2,044	16.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	62,362	38,598	100.0	61.9	17,424	27.9	6,340	10.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	24	0.4	22	0.4	1	0.2	1	1.0
Moderate-income	1,345	21.2	1,140	20.4	192	30.3	13	12.7
Middle-income	3,784	59.8	3,341	59.7	379	59.9	64	62.7
Upper-income	1,177	18.6	1,092	19.5	61	9.6	24	23.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,330	100.0	5,595	100.0	633	100.0	102	100.0
Percentage of Total Businesses:			88.4		10.0		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	6	1.6	6	1.6	0	0.0	0	0.0
Middle-income	316	84.7	315	84.7	1	100.0	0	0.0
Upper-income	51	13.7	51	13.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	373	100.0	372	100.0	1	100.0	0	0.0
Percentage of Total Farms:			99.7		0.3		0.0	

2017 FFIEC Census Data and 2017 D&B Information

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for the South Dakota MSAs for the year of loan origination. These estimated income levels changed slightly during the evaluation period. The table shows the estimated income for each year, as well as the income range for low-, moderate-, middle-, and upper-income borrowers.

**Borrower Income Levels
Rapid City, SD MSA**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2016	\$61,300	0 - \$30,649	\$30,650 - \$49,039	\$49,040 - \$73,559	\$73,560 - & above
2017	\$66,000	0 - \$32,999	\$33,000 - \$52,799	\$52,800 - \$79,199	\$79,200 - & above

For purposes of classifying census tracts by income level, this evaluation uses the FFIEC’s estimated median family income for the Rapid City MSA, which was \$56,970 for 2016 and \$63,776 for 2017.

Population. According to 2017 FFIEC adjusted census data, the assessment area population is 140,860. The latest American Community Survey statistics show that approximately half of the population in the assessment area lives in Rapid City (72,841). The majority of the population (52.1%) is between the ages of 25 and 64 years, according to adjusted census data. The remaining population is as follows: 23.7% is 17 years and younger, 9.1% is 18 to 24 years of age, and 15.1% is 65 years and over.

Housing Information. Based on 2017 FFIEC adjusted census data, this assessment area has 62,362 housing units: 61.9% are owner occupied, 27.9% are rental, and 10.2% are vacant. The median age of the housing stock is 42 years, which is slightly higher than the statewide median of 40 years. The median housing value is \$162,126, and the affordability ratio is 31.6, compared to 36.3 for the state. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio indicates greater affordability. The Rapid City MSA affordability ratio indicates that housing is less affordable in the area than in the state overall.

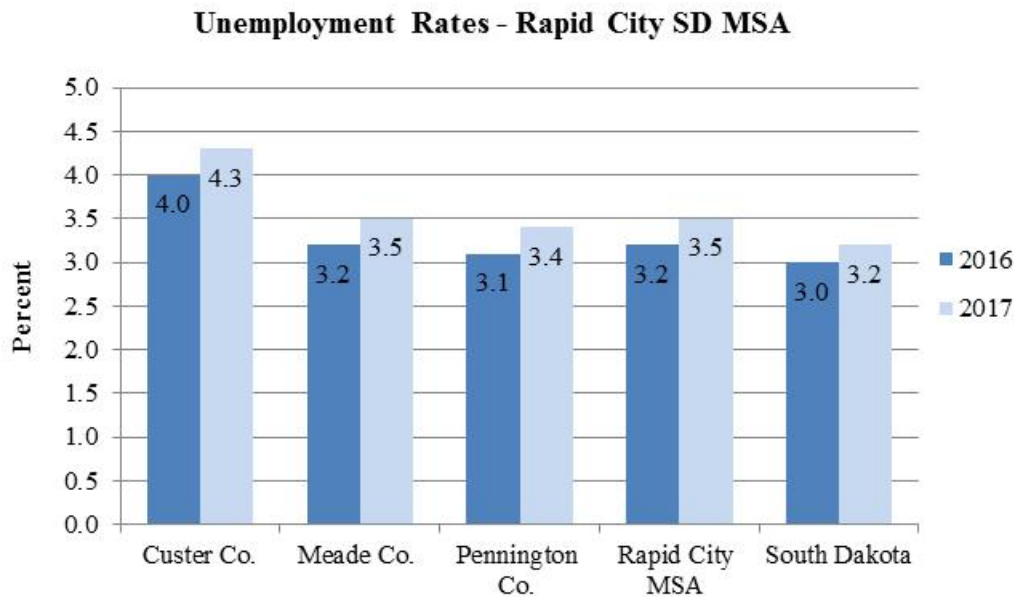
Bank management and a community contact stated that affordable housing in the area is limited. A contact stated that the rental prices are higher than local wage-earners can afford to pay. Bank management stated that Rapid City and Pennington County have some of the highest cost of living expenses compared to earned wages. According to adjusted census data, 55.2% of rental units have monthly rents higher than \$700, and the median gross rent is \$775. The contact stated that many low- and moderate-income residents in the area struggle to afford homeownership. Bank management noted that several generations will share a single-family home in order to manage housing costs.

General Economic and Business Information. Community contacts and bank management stated that economic conditions are stable. The main industries in the area are health care and tourism. Major employers outside of those industries include the nearby Ellsworth Air Force Base; the local, state, and federal governments; and the public school system. As the second largest city in South Dakota, Rapid City is an economic hub, attracting residents from a wide radius and extending to portions of Montana and Wyoming.

According to bank management, housing and retail growth occurs to the east, in Box Elder, Underwood, and Wall, and to the northwest toward and in Sturgis along Interstate 90. The topography of the region limits land use. Many of the new businesses in Rapid City and surrounding communities are national chain retailers. The regional health-care system continues to expand services and locations throughout the area.

In the more rural portions of the assessment area, agriculture is the primary industry. The main agricultural activity is ranching, specifically cow-calf operations. Some farming of wheat, corn, and other crops occurs, but it makes up a much smaller portion of the agricultural sector. Bank management stated that many ranchers in the area are retiring and selling their operations. Cow-calf operations are doing better than the farmers because of low commodity prices.

The Unemployment Rates chart provides the annual average unemployment rate for the individual counties in the MSA, for the Rapid City MSA, and for the state as a whole. The economy is experiencing low and relatively stable unemployment rates. On average, the unemployment rate in the Rapid City MSA increases by 1% each year during the winter. Community contacts and bank management explained that some seasonal fluctuations occur in the unemployment rate due to the tourism industry.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RAPID CITY MSA

The Lending Test performance in the Rapid City MSA assessment area is excellent. The distribution of the bank’s loans by borrower income and revenue size of businesses and farms is excellent, and the bank’s lending shows good distribution throughout the assessment area. The bank makes an adequate level of community development loans and demonstrates responsiveness to the community development credit needs in the assessment area. The bank extensively uses flexible loan programs for low- and moderate-income consumers and small farms in the assessment area to help meet credit needs. Examiners assigned equal weight to all loan types.

The Investment Test performance in this assessment area is adequate. The bank has an adequate level of qualified community development investments, which demonstrates adequate responsiveness to credit and community development needs.

Under the Service Test, delivery services are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences particular individuals or areas. Bank officers and employees provide a relatively high level of community development services.

LENDING TEST

The Lending Test performance in this assessment area is excellent.

Lending Activity

Lending activity reflects an excellent level of responsiveness to the credit needs in the assessment area. The bank's market share for HMDA, small business, and small farm loans is similar in 2016 and 2017. For HMDA loans, the bank ranked 8th among 161 lenders reporting HMDA loans in 2016, with a 3.3% market share, and 10th among 153 reporters in 2017, with a 2.8% market share. In 2016 and 2017, the bank ranked 2nd among 63 lenders reporting small business loans, with a 13.3% market share in 2016 and 13.8% in 2017. The bank ranked 1st among 63 lenders reporting small farm loans in 2016 and 2017, with a market share of 69.7% in 2016 and 63.2% in 2017. During the evaluation period, lending activity in this assessment area represented 11.7% by number and 7.0% by dollar amount of the bank's overall lending volume. Within the South Dakota assessment areas, the lending activity in the Rapid City MSA assessment area was 58.7% by number and 55.5% by dollar amount.

Distribution by Borrower Income Level and Size of Business and Farm

Overall, the bank's distribution of loans reflects excellent dispersion among businesses and farms of different sizes and borrowers of different income levels.

Residential Real Estate. The bank's residential real estate lending to low- and moderate-income borrowers is excellent. Examiners did not evaluate the bank's multifamily lending at the product level because of the limited volume. The following table illustrates the bank's HMDA loan data by borrower income and product type for 2016 and 2017 lending.

Borrower Distribution of HMDA Loans
Assessment Area: Rapid City MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2017					2016						2017					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	Count	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	1.0%	\$77	0.4%	19.2%	3	2.8%	3.1%	\$317	1.4%	1.7%	1	1.0%	4.3%	\$77	0.4%	2.2%
	Moderate	20	20.4%	\$2,471	14.1%	19.1%	12	11.2%	15.9%	\$1,838	8.0%	12.1%	20	20.4%	19.6%	\$2,471	14.1%	15.0%
	Middle	24	24.5%	\$4,241	24.2%	22.3%	28	26.2%	23.1%	\$5,090	22.3%	21.6%	24	24.5%	24.2%	\$4,241	24.2%	23.9%
	Upper	34	34.7%	\$8,427	48.0%	39.4%	58	54.2%	34.7%	\$14,829	64.9%	41.7%	34	34.7%	30.4%	\$8,427	48.0%	37.8%
	Unknown	19	19.4%	\$2,338	13.3%	0.0%	6	5.6%	23.2%	\$778	3.4%	22.9%	19	19.4%	21.5%	\$2,338	13.3%	21.1%
	Total	98	100.0%	\$17,554	100.0%	100.0%	107	100.0%	100.0%	\$22,852	100.0%	100.0%	98	100.0%	100.0%	\$17,554	100.0%	100.0%
REFINANCE	Low	2	5.9%	\$247	4.6%	19.2%	0	0.0%	3.2%	\$0	0.0%	1.5%	2	5.9%	6.0%	\$247	4.6%	3.3%
	Moderate	4	11.8%	\$426	7.9%	19.1%	7	10.8%	11.9%	\$900	6.0%	7.3%	4	11.8%	15.1%	\$426	7.9%	10.2%
	Middle	7	20.6%	\$775	14.5%	22.3%	9	13.8%	16.6%	\$1,403	9.4%	13.6%	7	20.6%	17.9%	\$775	14.5%	16.0%
	Upper	17	50.0%	\$3,444	64.2%	39.4%	46	70.8%	35.5%	\$11,043	74.2%	42.8%	17	50.0%	30.3%	\$3,444	64.2%	37.4%
	Unknown	4	11.8%	\$470	8.8%	0.0%	3	4.6%	32.8%	\$1,531	10.3%	34.8%	4	11.8%	30.8%	\$470	8.8%	33.2%
	Total	34	100.0%	\$5,362	100.0%	100.0%	65	100.0%	100.0%	\$14,877	100.0%	100.0%	34	100.0%	100.0%	\$5,362	100.0%	100.0%
HOME IMPROVEMENT	Low	2	12.5%	\$187	12.4%	19.2%	2	8.0%	6.7%	\$7	0.4%	2.3%	2	12.5%	4.5%	\$187	12.4%	2.8%
	Moderate	3	18.8%	\$149	9.9%	19.1%	4	16.0%	12.7%	\$178	9.8%	10.0%	3	18.8%	16.6%	\$149	9.9%	10.5%
	Middle	4	25.0%	\$181	12.0%	22.3%	6	24.0%	21.0%	\$217	11.9%	18.5%	4	25.0%	27.7%	\$181	12.0%	22.0%
	Upper	5	31.3%	\$846	56.2%	39.4%	13	52.0%	53.7%	\$1,423	78.0%	61.6%	5	31.3%	48.1%	\$846	56.2%	61.3%
	Unknown	2	12.5%	\$142	9.4%	0.0%	0	0.0%	6.0%	\$0	0.0%	7.6%	2	12.5%	3.2%	\$142	9.4%	3.4%
	Total	16	100.0%	\$1,505	100.0%	100.0%	25	100.0%	100.0%	\$1,825	100.0%	100.0%	16	100.0%	100.0%	\$1,505	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$702	100.0%	0.0%	1	100.0%	100.0%	\$103	100.0%	100.0%	2	100.0%	100.0%	\$702	100.0%	100.0%
	Total	2	100.0%	\$702	100.0%	100.0%	1	100.0%	100.0%	\$103	100.0%	100.0%	2	100.0%	100.0%	\$702	100.0%	100.0%
HMDA TOTALS	Low	5	3.3%	\$511	2.0%	19.2%	5	2.5%	3.3%	\$324	0.8%	1.7%	5	3.3%	4.7%	\$511	2.0%	2.4%
	Moderate	27	18.0%	\$3,046	12.1%	19.1%	23	11.6%	14.3%	\$2,916	7.4%	10.2%	27	18.0%	18.1%	\$3,046	12.1%	13.2%
	Middle	35	23.3%	\$5,197	20.7%	22.3%	43	21.7%	20.6%	\$6,710	16.9%	18.4%	35	23.3%	22.6%	\$5,197	20.7%	21.1%
	Upper	56	37.3%	\$12,717	50.6%	39.4%	117	59.1%	35.9%	\$27,295	68.8%	42.0%	56	37.3%	31.3%	\$12,717	50.6%	37.4%
	Unknown	27	18.0%	\$3,652	14.5%	0.0%	10	5.1%	26.0%	\$2,412	6.1%	27.8%	27	18.0%	23.3%	\$3,652	14.5%	26.0%
	Total	150	100.0%	\$25,123	100.0%	100.0%	198	100.0%	100.0%	\$39,657	100.0%	100.0%	150	100.0%	100.0%	\$25,123	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

For lending to low-income borrowers, the bank’s level of HMDA lending by number of loans for both years was below demographics and was generally comparable to lending reported by aggregate lenders. For lending to moderate-income borrowers, the bank’s level of lending by number was below demographics for 2016 and generally consistent with demographics in 2017, and it was generally comparable to the lending reported by aggregate lenders for both years. During the evaluation period, the bank also made loans to borrowers with unknown incomes, which primarily are loans related to investment properties. The bank’s lending performance is reasonable given several performance context factors. As noted, the bank’s performance generally was consistent with aggregate lenders. Although the bank ranked in the top 10 of aggregate lenders for both years, the bank’s market share was 3.3% in 2016 and 2.8% in 2017.

In addition, low- and moderate-income borrowers often are unable to afford homeownership. A community contact noted that while people can find work, most employment is low wage and in the tourism and retail sectors. Using the assumption that borrowers can generally obtain a home loan for approximately three times their annual income, an individual with the highest income in the low-income bracket (\$32,999) could afford a \$99,000 home, based on the 2017 FFIEC estimated median family income of \$66,600 for the Rapid City MSA. Using the same assumption for borrowers with the highest income in the moderate-income bracket (\$52,799), a moderate-income borrower could afford a \$158,400 home. The median housing value for the Rapid City MSA was \$162,126, according to 2017 adjusted

census data. This data suggests that homeownership would not be affordable for many low- and moderate-income borrowers in the assessment area. This is consistent with information shared by community contacts, who described a lack of affordable housing in the area.

The bank made extensive use of flexible lending programs in order to meet the credit needs of low- and moderate-income mortgage borrowers, which contributes to the overall excellent borrower distribution for HMDA lending. In this assessment area, the bank participated in SDHDA home loan programs and the Fannie Mae HomeReady program. These programs offer down-payment and closing-cost assistance and/or lower interest rates, which help make homeownership affordable to low- and moderate-income individuals. The bank's extensive use of these program shows a willingness to meet the credit needs of low- and moderate-income borrowers.

Consumer. The bank's consumer lending to low- and moderate-income borrowers is good. The following tables show the bank's consumer lending by product for each year. Aggregate lending data is not available for consumer loans.

2016 Consumer Loan Distribution by Income Level of Borrower Rapid City MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	7	400	5.7	3.5	17.8
Moderate	13	756	10.6	6.5	19.4
Middle	19	1,090	15.4	9.4	23.1
Upper	76	9,099	61.8	78.6	39.7
Unknown	8	227	6.5	2.0	0.0
Total	123	11,572	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	111	1,269	9.0	4.3	21.1
Moderate	195	3,627	15.7	12.3	18.3
Middle	298	6,862	24.1	23.2	20.2
Upper	629	17,661	50.8	59.7	40.5
Unknown	6	157	0.5	0.5	0.0
Total	1239	29,576	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	73	494	13.9	5.5	21.1
Moderate	104	996	19.8	11.0	18.3
Middle	95	1,350	18.1	14.9	20.2
Upper	249	6,149	47.5	68.0	40.5
Unknown	3	55	0.6	0.6	0.0
Total	524	9,044	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	3	9	5.9	0.4	21.1
Moderate	9	38	17.6	1.5	18.3
Middle	7	170	13.7	6.7	20.2
Upper	30	2,221	58.8	87.1	40.5
Unknown	2	113	3.9	4.4	0.0
Total	51	2,551	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	194	2,172	10.0	4.1	NA
Moderate	321	5,417	16.6	10.3	NA
Middle	419	9,472	21.6	18.0	NA
Upper	984	35,130	50.8	66.6	NA
Unknown	19	552	1.0	1.0	NA
Total	1937	52,743	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Rapid City MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	8	1,181	7.1	10.7	19.2
Moderate	14	845	12.4	7.7	19.1
Middle	16	1,347	14.2	12.2	22.3
Upper	69	7,347	61.1	66.6	39.4
Unknown	6	316	5.3	2.9	0.0
Total	113	11,036	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	101	1,198	11.1	6.0	21.6
Moderate	174	2,923	19.1	14.5	17.6
Middle	234	4,687	25.7	23.3	19.7
Upper	397	11,201	43.7	55.7	41.1
Unknown	3	103	0.3	0.5	0.0
Total	909	20,112	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	41	300	10.1	3.6	21.6
Moderate	67	883	16.5	10.7	17.6
Middle	108	1,863	26.7	22.5	19.7
Upper	184	4,880	45.4	58.9	41.1
Unknown	5	362	1.2	4.4	0.0
Total	405	8,288	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	11	42	2.6	1.2	21.6
Moderate	23	126	5.5	3.5	17.6
Middle	15	85	3.6	2.4	19.7
Upper	25	929	5.9	25.8	41.1
Unknown	347	2,421	82.4	67.2	0.0
Total	421	3,603	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	161	2,721	8.7	6.3	NA
Moderate	278	4,777	15.0	11.1	NA
Middle	373	7,982	20.2	18.5	NA
Upper	675	24,357	36.5	56.6	NA
Unknown	361	3,202	19.5	7.4	NA
Total	1848	43,039	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

In 2016, overall, the bank’s lending to low-income borrowers was below demographics and lending to moderate-income borrowers was generally consistent with demographics. For home equity loans, the bank’s lending to moderate-income borrowers was below demographics. In 2017, overall, the bank’s

lending to low-income borrowers was below demographics. The bank's lending to moderate-income borrowers in 2017 was consistent with demographics for motor vehicle and other secured loans and below demographics for home equity and other unsecured loans. The bank's level of lending to low- and moderate-income borrowers was reasonable. The bank competes with several local credit unions, as well as community, regional, and national banks, for consumer loans. With respect to home equity loans, as previously mentioned in this evaluation, low- and moderate-income individuals may have difficulty purchasing a home; in addition, they may not have sufficient equity to take out such loans.

The bank introduced the First Care Credit loan program in the Rapid City MSA assessment area in 2017, which explains the significant increase in other unsecured loans. The unsecured loan program allows individuals to repay medical expenses over time at reasonable interest rates, according to bank management. Although income information is unavailable for these borrowers, the program likely helps meet the credit needs of low- and moderate-income borrowers who need longer repayment periods.

The bank continues to offer small-dollar consumer loans to meet the credit needs of borrowers in the Rapid City MSA assessment area. The bank originated 6.1% of consumer loans in amounts of \$3,000 or less. Of these loans, 74.8% were to low- and moderate-income borrowers. These small-dollar loan originations show the bank's willingness to meet small-dollar credit needs for low- and moderate-income borrowers in the MSA.

Small Business. The bank's lending to small businesses is excellent. The following table shows the small business and small farm loan data by revenue and loan size for 2016 and 2017.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: Rapid City MSA

Product Type	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison													
	2017					2016					2017								
	Bank		Total Businesses			Count		Dollar			Count		Dollar						
	Count	Dollar			%	Bank	Agg		Bank	Agg		Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	261	66.1%	\$13,155	49.3%	88.4%	244	65.2%	46.3%	\$13,853	50.3%	37.7%	261	66.1%	50.8%	\$13,155	49.3%	41.1%
		Over \$1 Million	87	22.0%	\$11,676	43.7%	10.0%	78	20.9%					87	22.0%				
		Total Rev. available	348	88.1%	\$24,831	93.0%	98.4%	322	86.1%					348	88.1%				
		Rev. Not Known	47	11.9%	\$1,877	7.0%	1.6%	52	13.9%					47	11.9%				
		Total	395	100.0%	\$26,708	100.0%	100.0%	374	100.0%					395	100.0%				
	Loan Size	\$100,000 or Less	328	83.0%	\$9,517	35.6%		318	85.0%	88.8%	\$9,338	33.9%	26.4%	328	83.0%	88.0%	\$9,517	35.6%	25.6%
		\$100,001 - \$250,000	45	11.4%	\$7,305	27.4%		33	8.8%	5.2%	\$5,572	20.2%	15.8%	45	11.4%	5.9%	\$7,305	27.4%	18.4%
		\$250,001 - \$1 Million	22	5.6%	\$9,886	37.0%		23	6.1%	6.0%	\$12,648	45.9%	57.9%	22	5.6%	6.1%	\$9,886	37.0%	56.0%
		Total	395	100.0%	\$26,708	100.0%		374	100.0%	100.0%	\$27,558	100.0%	100.0%	395	100.0%	100.0%	\$26,708	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	228	87.4%	\$5,697	43.3%												
Small Farm	Revenue	\$1 Million or Less	253	95.1%	\$17,256	93.6%	99.7%	228	94.6%	82.9%	\$13,191	90.9%	84.8%	253	95.1%	79.6%	\$17,256	93.6%	82.8%
		Over \$1 Million	5	1.9%	\$927	5.0%	0.3%	7	2.9%				5	1.9%					
		Total Rev. available	258	97.0%	\$18,183	98.6%	100.0%	235	97.5%				258	97.0%					
		Not Known	8	3.0%	\$251	1.4%	0.0%	6	2.5%				8	3.0%					
		Total	266	100.0%	\$18,434	100.0%	100.0%	241	100.0%				266	100.0%					
	Loan Size	\$100,000 or Less	209	78.6%	\$7,087	38.4%		207	85.9%	85.0%	\$7,097	48.9%	46.4%	209	78.6%	81.2%	\$7,087	38.4%	39.8%
		\$100,001 - \$250,000	46	17.3%	\$7,684	41.7%		25	10.4%	11.0%	\$4,230	29.2%	29.6%	46	17.3%	15.0%	\$7,684	41.7%	40.0%
		\$250,001 - \$500,000	11	4.1%	\$3,663	19.9%		9	3.7%	4.0%	\$3,180	21.9%	24.0%	11	4.1%	3.8%	\$3,663	19.9%	20.2%
		Total	266	100.0%	\$18,434	100.0%		241	100.0%	100.0%	\$14,507	100.0%	100.0%	266	100.0%	100.0%	\$18,434	100.0%	100.0%
		Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	199	78.7%	\$6,759	39.2%												

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2017 FRIEC Census Data and 2017 D&B Information

The bank originated 65.2% and 66.1% of its loans to small businesses during 2016 and 2017, respectively. According to D&B data, 88.4% of businesses had gross annual revenues of \$1 million or less for 2017. While the bank's lending was below demographics, its performance significantly exceeded aggregate lenders for both years, which originated 46.3% of loans to small businesses in 2016 and 50.8% in 2017. Although the bank was the second-largest small business lender in the assessment area for both years, the bank only had 13.3% and 13.8% of the market share in 2016 and 2017, respectively. Two large national banks with offices in the assessment area ranked first and third. National banks and credit card lenders are major competitors, according to bank management, and competition for small business lending is strong in the Rapid City MSA assessment area.

The bank made loans of varying sizes, which showed a willingness to meet the credit needs of businesses in the assessment area, especially those of small businesses, which typically request smaller loan amounts. The bank extended a substantial majority (83.0%) of small business loans in amounts of \$100,000 or less during 2017. The figure was similar (85.0%) for 2016.

Small Farm. The bank's lending to small farms is excellent. In 2016 and 2017, the bank's lending to small farms was generally comparable to demographics. The bank originated 94.6% and 95.1% of its loans to small farms during 2016 and 2017, respectively. According to 2017 D&B data, 99.7% of farms had gross annual revenues of \$1 million or less. The bank's lending performance exceeded aggregate lenders, which originated 82.9% of loans to small farms in 2016 and 79.6% in 2017. Bank management noted that its primary competition for small farm lending in the assessment area is specialized agricultural lenders. The bank was the leading lender among those reporting small farm data in the assessment area.

The majority of the bank's small farm loans, 85.9% in 2016 and 78.6% in 2017, were for amounts of \$100,000 or less. The bank's lending is generally comparable to aggregate lenders, which reported 85.0% and 81.2% of their loans in amounts of \$100,000 or less in 2016 and 2017, respectively. The bank's lending demonstrates a willingness to meet the credit needs of small farms in the assessment area, which typically request smaller loan amounts.

The bank made extensive use of FSA loan programs in the assessment area, which provide flexibility to lend to small farms that may not otherwise qualify for financing. These programs helped the bank meet the credit needs of the small farms in the area. Overall, the bank's lending to small farms is excellent.

Geographic Distribution

Overall, the geographic distribution of the bank's HMDA, consumer, small business, and small farm loans in the Rapid City MSA assessment area is good and does not reveal any unexplained gaps in lending. For 2016, the assessment area had 1 low-, 7 moderate-, 17 middle-, and 5 upper-income tracts. In 2017, the moderate-income tracts decreased to 6 and middle-income tracts increased to 18; the majority (60.0%) of tracts are middle-income. The bank made loans in all of its census tracts for both years.

Residential Real Estate. The geographic distribution of the bank's HMDA loans is good. Examiners did not evaluate the bank's multifamily lending at the product level because of the limited volume. The following table shows the bank's HMDA loans by census tract income level and product type for 2016 and 2017. The table also includes aggregate lending data.

Geographic Distribution of HMDA Loans
Assessment Area: Rapid City MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	10	10.2%	\$1,189	6.8%	11.8%	18	16.8%	15.4%	\$2,525	11.0%	11.3%	10	10.2%	13.0%	\$1,189	6.8%	8.6%
	Middle	72	73.5%	\$12,821	73.0%	64.9%	70	65.4%	65.2%	\$14,885	65.1%	64.8%	72	73.5%	69.3%	\$12,821	73.0%	69.6%
	Upper	16	16.3%	\$3,544	20.2%	23.2%	19	17.8%	19.3%	\$5,442	23.8%	23.6%	16	16.3%	17.5%	\$3,544	20.2%	21.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	98	100.0%	\$17,554	100.0%	100.0%	107	100.0%	100.0%	\$22,852	100.0%	100.0%	98	100.0%	100.0%	\$17,554	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	3	8.8%	\$249	4.6%	11.8%	3	4.6%	11.0%	\$1,535	10.3%	7.5%	3	8.8%	10.5%	\$249	4.6%	6.4%
	Middle	28	82.4%	\$4,355	81.2%	64.9%	47	72.3%	64.7%	\$8,665	58.2%	63.1%	28	82.4%	65.1%	\$4,355	81.2%	61.4%
	Upper	3	8.8%	\$758	14.1%	23.2%	15	23.1%	24.2%	\$4,677	31.4%	29.3%	3	8.8%	24.4%	\$758	14.1%	32.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	34	100.0%	\$5,362	100.0%	100.0%	65	100.0%	100.0%	\$14,877	100.0%	100.0%	34	100.0%	100.0%	\$5,362	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	12.5%	\$151	10.0%	11.8%	3	12.0%	9.3%	\$433	23.7%	6.5%	2	12.5%	8.6%	\$151	10.0%	5.4%
	Middle	13	81.3%	\$1,018	67.6%	64.9%	18	72.0%	62.7%	\$886	48.5%	52.7%	13	81.3%	72.6%	\$1,018	67.6%	70.7%
	Upper	1	6.3%	\$336	22.3%	23.2%	4	16.0%	28.0%	\$506	27.7%	40.8%	1	6.3%	18.8%	\$336	22.3%	24.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$1,505	100.0%	100.0%	25	100.0%	100.0%	\$1,825	100.0%	100.0%	16	100.0%	100.0%	\$1,505	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	30.0%	1	100.0%	30.0%	\$103	100.0%	28.9%	0	0.0%	44.4%	\$0	0.0%	64.9%
	Middle	2	100.0%	\$702	100.0%	53.1%	0	0.0%	60.0%	\$0	0.0%	59.6%	2	100.0%	51.9%	\$702	100.0%	34.7%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	10.0%	\$0	0.0%	11.5%	0	0.0%	3.7%	\$0	0.0%	0.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$702	100.0%	100.0%	1	100.0%	100.0%	\$103	100.0%	100.0%	2	100.0%	100.0%	\$702	100.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	15	10.0%	\$1,589	6.3%	11.8%	25	12.6%	13.5%	\$4,596	11.6%	10.1%	15	10.0%	12.2%	\$1,589	6.3%	9.7%
	Middle	115	76.7%	\$18,896	75.2%	64.9%	135	68.2%	64.9%	\$24,436	61.6%	63.8%	115	76.7%	68.3%	\$18,896	75.2%	66.4%
	Upper	20	13.3%	\$4,638	18.5%	23.2%	38	19.2%	21.5%	\$10,625	26.8%	26.0%	20	13.3%	19.3%	\$4,638	18.5%	23.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	150	100.0%	\$25,123	100.0%	100.0%	198	100.0%	100.0%	\$39,657	100.0%	100.0%	150	100.0%	100.0%	\$25,123	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data and 2015 ACS Data

Overall, the bank’s HMDA lending was generally consistent with demographic data and aggregate lending data. The bank did not make any HMDA loans in the low-income tract; this result was similar to aggregate lenders, which reported only 0.1% of loans in that tract in both 2016 and 2017. The low-income tract has a limited number of owner-occupied housing units; owner-occupied units dropped from 50 in 2016 to 24 in 2017. The majority of available housing, 81.5% for 2017, was rental units, which explains the very limited lending by both the bank and aggregate lenders. The fact that an air force base is located in the low-income tract helps to explain the small number of owner-occupied units and the limited home loan demand.

The bank’s lending in the moderate-income census tracts was generally consistent with demographic data and aggregate lending data. The bank originated HMDA loans in all of the moderate-income census tracts during the evaluation period. The bank made 12.6% and 10.0% of HMDA loans in the moderate-income tracts in 2016 and 2017, respectively. The 2017 census data showed that 11.8% of owner-occupied units are in these tracts and 13.5% of families reside in these tracts. Aggregate lending in the moderate-income tracts was 13.5% and 12.2% in 2016 and 2017, respectively. Aggregate lenders in the assessment area include large national banks with local branch offices, mortgage companies, and credit unions, and competition for HMDA loans is strong. Six of the moderate-income tracts are located in downtown Rapid City and are primarily commercial and retail areas. The seventh tract, which changed to middle-income in

2017, was located in Meade County and is rural and sparsely populated. According to census data, 17.9% of the families in the moderate-income tracts have incomes below the poverty level, which makes it difficult to afford homeownership.

Consumer. The geographic distribution of the bank's consumer loans is good. The following tables show the bank's consumer loans by census tract income level and product type for 2016 and 2017. Aggregate lending data is not available for consumer lending.

2016 Consumer Loan Distribution by Income Level of Geography Rapid City MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.1
Moderate	6	634	4.9	5.5	14.1
Middle	76	5,514	61.8	47.6	63.8
Upper	41	5,424	33.3	46.9	22.0
Unknown	0	0	0.0	0.0	0.0
Total	123	11,572	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	3	60	0.2	0.2	0.5
Moderate	159	3,809	12.8	12.9	22.0
Middle	891	21,213	71.9	71.7	58.9
Upper	186	4,494	15.0	15.2	18.6
Unknown	0	0	0.0	0.0	0.0
Total	1239	29,576	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.5
Moderate	62	888	11.8	9.8	22.0
Middle	403	6,760	76.9	74.7	58.9
Upper	59	1,396	11.3	15.4	18.6
Unknown	0	0	0.0	0.0	0.0
Total	524	9,044	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.5
Moderate	4	59	7.8	2.3	22.0
Middle	32	1,164	62.7	45.6	58.9
Upper	15	1,328	29.4	52.1	18.6
Unknown	0	0	0.0	0.0	0.0
Total	51	2,551	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	3	60	0.2	0.1	NA
Moderate	231	5,390	11.9	10.2	NA
Middle	1402	34,651	72.4	65.7	NA
Upper	301	12,642	15.5	24.0	NA
Unknown	0	0	0.0	0.0	NA
Total	1937	52,743	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Rapid City MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.1
Moderate	1	40	0.9	0.4	11.8
Middle	82	6,832	72.6	61.9	64.9
Upper	30	4,164	26.5	37.7	23.2
Unknown	0	0	0.0	0.0	0.0
Total	113	11,036	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.5
Moderate	84	1,449	9.2	7.2	16.7
Middle	679	15,106	74.7	75.1	63.7
Upper	146	3,557	16.1	17.7	19.2
Unknown	0	0	0.0	0.0	0.0
Total	909	20,112	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	86	0.5	1.0	0.5
Moderate	19	254	4.7	3.1	16.7
Middle	323	6,316	79.8	76.2	63.7
Upper	61	1,632	15.1	19.7	19.2
Unknown	0	0	0.0	0.0	0.0
Total	405	8,288	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	8	0.2	0.2	0.5
Moderate	63	522	15.0	14.5	16.7
Middle	303	2,274	72.0	63.1	63.7
Upper	54	799	12.8	22.2	19.2
Unknown	0	0	0.0	0.0	0.0
Total	421	3,603	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	3	94	0.2	0.2	NA
Moderate	167	2,265	9.0	5.3	NA
Middle	1387	30,528	75.1	70.9	NA
Upper	291	10,152	15.7	23.6	NA
Unknown	0	0	0.0	0.0	NA
Total	1848	43,039	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

The bank's limited consumer lending in the low-income census tract for both years is reasonable given the characteristics of the area and is consistent with demographics. As previously mentioned, an air force base is located in this tract; census data shows that only 0.1% of the owner-occupied units and 0.5% of households were located in this census tract. Furthermore, a credit union is located on the base.

The bank extended consumer loans in each of the moderate-income census tracts, although its level of lending was below demographics. In the moderate-income census tracts, 42.7% of households had

incomes below the poverty level in 2016 and 33.5% in 2017. Furthermore, in 2016 and 2017, respectively, 42.4% and 30.8% of households in the moderate-income tracts had rental costs in excess of 30% of their income. Of the owner-occupied units in the assessment area, 14.1% in 2016 and 11.8% in 2017 were located in the moderate-income census tracts. These figures indicate a limited level of loan demand. In addition, the market for consumer lending is highly competitive in the Rapid City MSA. Many banks and credit unions have locations in downtown Rapid City, where six of the moderate-income tracts are located.

Overall, the bank extended the majority of its consumer loans in the middle-income census tracts, which is consistent with the demographic data. The majority of households and owner-occupied units are located in the middle-income tracts.

Small Business. The geographic distribution of the bank’s small business lending is good. The following table shows the geographic distribution of the bank’s 2016 and 2017 small business and small farm loans, as well as aggregate lending data.

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Rapid City MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.4%	1	0.3%	0.2%	\$575	2.1%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Moderate	42	10.6%	\$2,770	10.4%	20.4%	58	15.5%	17.7%	\$3,898	14.1%	22.7%	42	10.6%	15.2%	\$2,770	10.4%	14.9%
	Middle	285	72.2%	\$18,799	70.4%	59.7%	261	69.8%	62.2%	\$18,981	68.9%	55.1%	285	72.2%	62.5%	\$18,799	70.4%	64.2%
	Upper	68	17.2%	\$5,139	19.2%	19.5%	54	14.4%	17.6%	\$4,104	14.9%	20.6%	68	17.2%	19.9%	\$5,139	19.2%	19.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	1.1%	0	0.0%	2.1%	\$0	0.0%	1.2%
Total	395	100.0%	\$26,708	100.0%	100.0%	374	100.0%	100.0%	\$27,558	100.0%	100.0%	395	100.0%	100.0%	\$26,708	100.0%	100.0%	
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.6%	85	35.3%	35.5%	\$4,397	30.3%	31.1%	0	0.0%	0.2%	\$0	0.0%	1.7%
	Middle	264	99.2%	\$18,342	99.5%	84.7%	155	64.3%	61.8%	\$10,088	69.5%	65.1%	264	99.2%	96.2%	\$18,342	99.5%	97.2%
	Upper	2	0.8%	\$92	0.5%	13.7%	1	0.4%	1.7%	\$22	0.2%	3.5%	2	0.8%	2.4%	\$92	0.5%	0.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.3%	0	0.0%	1.2%	\$0	0.0%	0.4%	
Total	266	100.0%	\$18,434	100.0%	100.0%	241	100.0%	100.0%	\$14,507	100.0%	100.0%	266	100.0%	100.0%	\$18,434	100.0%	100.0%	

Originations & Purchases
2017 FFIEC Census Data and 2017 D&B Information

The bank’s limited small business lending in the low-income census tract is reasonable because it is comparable to aggregate lenders’ performance and demographics for both years. The tract is part of Ellsworth Air Force Base, and demographic information shows only a small number of businesses located there.

The bank made 15.5% and 10.4% of its small business loans in moderate-income tracts in 2016 and 2017, respectively. The bank’s lending in the moderate-income census tracts was generally comparable to aggregate lenders in 2016 and slightly below aggregate lenders in 2017. According to D&B data, 22.6% of small business entities were in moderate-income census tracts in 2016 and 20.4% in 2017; the bank’s lending was below demographics for both years. Overall, the bank extended the majority of its small business loans in the middle-income census tracts, which was consistent with the demographic data and aggregate lending data. D&B data indicates that 57.7% and 59.7% of small businesses were located in the middle-income tracts for 2016 and 2017, respectively.

While the bank’s record of small business lending in the low- and moderate-income census tracts falls below demographics for both years and slightly below aggregate lenders in 2017, it remains reasonable.

Competition in the Rapid City MSA is strong. Furthermore, branches of the bank's competitors are also located in the moderate-income census tracts in downtown Rapid City. The bank made small business loans in each moderate-income census tract in the assessment area in both 2016 and 2017. Six moderate-income census tracts are located in downtown Rapid City and include several parks, schools, and many national chain retailers and restaurants. In 2016, the remaining moderate-income census tract was in Meade County, a rural section of the assessment area.

Small Farm. The geographic distribution of small farm loans is good. Neither the bank nor aggregate lenders extended any small farm loans in the low-income census tract because no farms are located there.

In 2016, the bank's lending in moderate-income census tracts slightly exceeded demographics and was consistent with aggregate lending data. In 2017, the bank did not make any loans in the moderate-income tracts, which is consistent with demographics and aggregate lending data. According to 2016 D&B data, 132 small farms, or 29.7%, were located in the moderate-income census tracts, and only 6 small farms, or 1.6%, were in those tracts for 2017. The income designation of a moderate-income census tract in Meade County was changed to middle-income for 2017 and significantly reduced the percentage of small farms located in the moderate-income tracts. This census tract had 126 small farms in 2016 and 110 in 2017; the bank made numerous small farm loans in this census tract for both years. The remaining moderate-income census tracts for 2017 are not rural areas as they are located in Rapid City.

The majority of the bank's small farm loans are in the middle-income census tracts, which is consistent with demographic information and aggregate lending data. The bank made small farm loans throughout the rural portions of its assessment area, including all but one of the census tracts in Meade County. Small farm lending in Pennington County is concentrated in census tract 116.00, which is a more rural area east of Rapid City.

Community Development Lending

The bank has an adequate level of community development loans in this assessment area. It originated two affordable housing loans totaling \$269,184. These loans are responsive to community needs because they helped finance two eight-unit buildings with rents below fair market rent. A community contact stated that affordable housing is a concern because rental prices are higher than many local wage earners can afford. One of the properties is located in a moderate-income census tract. While this is a decrease in activity from the previous evaluation, competition for community development loans is strong in this assessment area.

INVESTMENT TEST

The bank's qualified investment activity in the Rapid City MSA assessment area is adequate. The bank held qualified investments totaling \$2.5 million for the evaluation period. Although the bank did not purchase any qualified investments that directly benefited the assessment area during the evaluation period, it continued to hold a \$700,000 bond for revitalizing and stabilizing a moderate-income area in Rapid City by financing improvements to the wastewater collection and treatment facilities. The bank continues to hold five Custer County school district bonds totaling \$1.8 million.³⁴

³⁴ In 2014, the OMB revised the Rapid City MSA to include Custer County. Prior to 2014, Custer County was part of the bank's Edgemont assessment area. In prior evaluations, the Custer County school district bonds were included in the Edgemont assessment area investment totals.

The bank also made adequate qualified investments in the form of donations, as shown in the Qualified Investment Donations table at right. Of the \$53,778 in donations during the evaluation period, the majority benefited organizations that provide community services to low- and moderate-income individuals. The funds helped local organizations provide food, medical services, and education to address community needs. The bank also contributed to organizations that address affordable housing concerns by providing assistance for home improvement projects and down-payment costs. These donations demonstrate adequate responsiveness to the needs of residents, businesses, and farms in the assessment area.

Qualified Investment Donations in the Rapid City MSA		
<i>First Interstate Bank</i>		
	#	\$
Affordable Housing	3	8,269
Community Service	14	23,234
Economic Development	1	1,000
Total	18	32,503
<i>Foundation</i>		
	#	\$
Affordable Housing	4	1,035
Community Service	22	20,240
Total	26	21,275

SERVICE TEST

The bank’s delivery systems are readily accessible throughout the assessment area. Hours and services do not vary in a way that inconveniences particular individuals or areas. The bank did not make any changes to its delivery system that adversely affected the residents, businesses, or farms in the assessment area. Finally, the bank provides a relatively high level of community development services in the Rapid City MSA.

Retail Services

Delivery systems in the assessment area are readily accessible to the bank’s geographies and to individuals of different incomes. During the evaluation period, the bank operated eight offices in the Rapid City MSA assessment area: seven full-service branches and a stand-alone drive-up facility. Two branches are located in Rapid City, both with drive-up facilities and ATMs as well as extended weekday and Saturday hours. One of the Rapid City branches is located in a moderate-income census tract and the other is in a middle-income census tract. The branch in the middle-income census tract is located in close proximity to two moderate-income tracts.

The bank also operated a branch in each of the following five communities: Custer, Hill City, New Underwood, Sturgis, and Wall. The stand-alone drive-up facility is located in Custer. The branches in Hill City, New Underwood, Sturgis, and Wall offer extended weekday hours. These offices, including the Custer drive-up facility, also offer weekend hours. Of the branches outside Rapid City, all but the Hill City branch are located in middle-income census tracts. The bank did not open or close any offices in the assessment area during the evaluation period but did close a deposit-taking ATM located in a middle-income tract in Rapid City. The closure did not adversely affect the availability of delivery systems in the assessment area.

Additional delivery services include online, mobile, and telephone banking, as well as remote deposit capture. These services allow customers to obtain deposit and loan account information, transfer funds, make loan payments, remotely deposit checks, open new accounts, and apply for certain consumer loans. The hours of operation and services provide reasonable means for customers to complete many types of banking activities outside of normal service hours.

The following table shows the geographic distribution of branches and ATMs in the assessment area for 2017.

Geographic Distribution of Branches & ATMS
Assessment Area: Rapid City MSA

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend Hours	Week-end Hours	Total ATMs		Full Service ATMs			Cash only ATMs			Census Tracts		House holds	Total Businesses			
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed			#	%	
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	3.3%	0.5%	0.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	12.5%	0	0	1	1	1	Total	5	35.7%	0	0.0%	0	0	5	35.7%	0	0	6	20.0%	16.7%	21.2%
DTO	0		0	0				SA	4		0		0	0	4		0	0				
Middle	6	75.0%	0	0	3	4	4	Total	8	57.1%	0	0.0%	0	1	8	57.1%	0	0	18	60.0%	63.7%	59.8%
DTO	1		0	0				SA	2		0		0	1	2		0	0				
Upper	1	12.5%	0	0	1	1	1	Total	1	7.1%	0	0.0%	0	0	1	7.1%	0	0	5	16.7%	19.2%	18.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	0	0	5	6	6	Total	14	100.0%	0	0.0%	0	1	14	100.0%	0	0	30	100.0%	100.0%	100.0%
DTO	1		0	0				SA	6		0		0	1	6		0	0				

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The community development services by purpose are shown in the table at right. Fifteen employees provided 22 services at 11 organizations during the evaluation period.

Community Development Services in the Rapid City MSA	
Purpose	#
Community Services	17
Economic Development	1
Affordable Housing	4
Total	22

Bank employees provided financial expertise primarily to organizations that provide essential services to low- and moderate-income individuals, such as shelter, food, and education. Specifically, employees in the Rapid City MSA assessment area served as board or committee members for organizations that teach students financial literacy, attract and retain small businesses, and provide assistance to low- and moderate-income homebuyers. The bank's record of providing community development services is responsive to community needs.

METROPOLITAN AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SIOUX FALLS, SOUTH DAKOTA, MSA 43620 ASSESSMENT AREA (2016 ONLY)

Examiners conducted a limited-scope review of the bank’s CRA performance in the Sioux Falls, SD MSA assessment area. They determined that the bank’s lending, investment, and service performance in this assessment area is below the performance in the full-scope MSA assessment area. The one office in this assessment area was closed in mid-2016. Therefore, the bank’s activities during the evaluation period were limited, and this assessment area was evaluated for 2016 only. This performance does not change the conclusion for the metropolitan portion of the state. Examiners did not evaluate HMDA, small farm, or small business lending in this assessment due to lack of or limited loans.

This assessment area consisted of Minnehaha County and a portion of Lincoln County, which were part of the Sioux Falls MSA. The bank operated one limited-service branch in the assessment area, located in an upper-income tract; the bank closed this branch on June 16, 2016. Middle- and upper-income census tracts bordered the census tract in which the branch was located except on the northwest, which was bordered by a moderate-income tract. This closure does not appear to have adversely affected low- and moderate-income individuals or geographies. According to 2016 FFIEC adjusted census data, the population of the assessment area was 203,628.³⁵

The following table provides information regarding the demographic characteristics of the assessment area, based on 2016 FFIEC adjusted census data.

Assessment Area Demographics – Sioux Falls Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	0	0.0	0.0	17.8
Moderate Income	14	28.0	24.4	17.6
Middle Income	24	48.0	49.4	25.9
Upper Income	12	24.0	26.2	38.7
Total	50	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during 2016. The bank’s consumer lending includes indirect, motor vehicle secured loans.

Lending Activity in the Sioux Falls Assessment Area	
<i>Loan Type</i>	<i>2016</i>
Small Business	15
Small Farm	0
HMDA	46
Consumer	545
Total	606

³⁵ The FFIEC 2016 adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data.

By number of loans, the Sioux Falls MSA assessment area accounts for 1.3% of the bank's overall lending during the evaluation period and 6.6% of the bank's lending activity in the South Dakota assessment areas. In 2016, the bank ranked 25th out of 68 institutions reporting small business and small farm loans in the assessment area. It extended less than 1.0% of the small business and small farm loans reported by aggregate lenders in the assessment area. For HMDA loans, the bank ranked 27th among 219 aggregate lenders in 2016. The bank's lending accounted for less than 1.0% of HMDA loans in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF SOUTH DAKOTA

The facts and data that examiners reviewed, including performance and demographic information, are in Appendix D accompanying this report. In addition, the Institution section shows the bank's community development lending and qualified investments for each assessment area. Conclusions regarding performance of the limited-scope MSA assessment area, which did not affect the state rating, are shown in the table below.

Performance in the Limited-Scope Review South Dakota MSA Assessment Area			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Sioux Falls MSA	Below	Below	Below

NONMETROPOLITAN STATEWIDE AREAS LIMITED REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BELLE FOURCHE, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Belle Fourche assessment area. They determined that the bank’s lending, investment, and service performances in this assessment area are consistent with the overall state rating.

This assessment area consists of Butte and Lawrence counties, in western South Dakota. The assessment area is contiguous to and north of the Rapid City MSA assessment area. In 2016, the assessment area included one moderate-, four middle- and two upper-income census tracts. The income classifications of some tracts changed in 2017, as shown in the table below. None of the tracts were considered distressed or underserved during the evaluation period. According to 2017 FFIEC adjusted census data, the population of the assessment area is 34,937.³⁶

The bank operated five full-service branches with ATMs. The bank also operated one stand-alone cash-dispensing-only ATM in Spearfish. The bank closed the stand-alone ATM in 2017. All of the branches offer drive-up facilities, four have extended hours, and three have weekend hours. The branches are located in the communities of Belle Fourche (one), Lead (one), Deadwood (one), and Spearfish (two). Three of the branches are located in middle-income tracts and two in upper-income tracts. In 2016, one branch office was near a moderate-income tract; however, as noted above, the income designation of that tract changed to middle-income in 2017.

The following table provides information regarding the demographic characteristics of the assessment area based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Belle Fourche Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	#	%		
Low Income	0	0.0	0.0	17.9
Moderate Income	0	0.0	0.0	20.3
Middle Income	6	85.7	79.5	19.7
Upper Income	1	14.3	20.5	42.1
Total	7	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

³⁶ The FFIEC adjusted census data is based on the decennial U.S. Census data and the ACS five-year estimate data.

Lending Activity in the Belle Fourche Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	206	195	401
Small Farm	58	63	121
HMDA	212	152	364
Consumer	953	935	1,888
Total	1,429	1,345	2,774

By number, the Belle Fourche assessment area accounts for 6.0% of the bank’s overall lending during the evaluation period and 30.0% of the bank’s lending activity in the South Dakota assessment areas. In 2017, the bank ranked 1st among 47 aggregate lenders in the assessment area. It extended 26.2% of small business and small farm loans reported in the assessment area in 2017. The bank also ranked 1st among 44 aggregate lenders for small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st among 123 aggregate lenders in 2016 and 1st among 117 aggregate lenders in 2017. The bank’s lending accounted for 11.8% of the HMDA loans reported in the assessment area in 2017 and 16.4% in 2016.

The bank’s community development lending in the Belle Fourche assessment area is noteworthy. The bank made two community development loans totaling \$723,238, which financed affordable housing in the assessment area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE EDMONT, SOUTH DAKOTA, ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank’s CRA performance in the Edgemont assessment area. They determined that the bank’s lending performance in this assessment area is below the overall state rating due to a lack of community development lending and limited use of flexible loan programs. The bank’s investment and service performances in this assessment area are consistent with the overall state rating. Examiners did not evaluate the bank’s HMDA and small farm lending due to limited loans.

This assessment area consists of Fall River County in the western corner of South Dakota. The assessment area is contiguous with and south of the Rapid City MSA assessment area. In 2016 and 2017, the assessment area consisted of two middle-income tracts. Neither of the tracts was considered distressed or underserved during the evaluation period. According to 2017 FFIEC adjusted census data, the population of the assessment area is 6,906.

The bank operates two full-service branches: one in Edgemont without an ATM and one in Hot Springs with an ATM. Both offices have a drive-up facility and operate with extended hours; the Hot Springs branch offers weekend hours.

The following table provides information regarding the demographic characteristics of the assessment area, based on 2017 FFIEC adjusted census data.

Assessment Area Demographics – Edgemont Assessment Area				
<i>Income Category</i>	<i>Tract Distribution</i>		<i>Percentage of Families by Tract</i>	<i>Percentage of Families by Income Level</i>
	<i>#</i>	<i>%</i>		
Low Income	0	0.0	0.0	18.4
Moderate Income	0	0.0	0.0	19.2
Middle Income	2	100.0	100.0	23.9
Upper Income	0	0.0	0.0	38.4
Total	2	100.0	100.0	100.0

The following table shows the bank’s lending activity in the assessment area during the evaluation period.

Lending Activity in the Edgemont Assessment Area			
<i>Loan Type</i>	<i>2016</i>	<i>2017</i>	<i>Total</i>
Small Business	43	26	69
Small Farm	25	24	49
HMDA	21	18	39
Consumer	131	152	283
Total	220	220	440

By number, the Edgemont assessment area accounts for 0.9% of the bank’s overall lending during the evaluation period and 4.8% of the bank’s lending activity in the South Dakota assessment areas. In 2017, the bank ranked 1st among 26 aggregate lenders in the assessment area. It extended 34.0% of small business and small farm loans reported in the assessment area. The bank also ranked 1st among 23 aggregate lenders for small business and small farm lending in 2016. For HMDA loans, the bank ranked 1st among 42 aggregate lenders in 2016 and 3rd among 47 aggregate lenders in 2017. The bank’s HMDA lending accounted for 10.0% of the HMDA loans reported in the assessment area in 2017 and 14.8% in 2016.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF SOUTH DAKOTA

The facts and data that examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. In addition, the Institution section shows the bank’s community development lending and qualified investments for each assessment area. The South Dakota state section of the report also shows qualified investments in the form of donations and community development services for each assessment area. Conclusions regarding performance of the limited-scope assessment areas, which did not affect the overall state rating, are shown in the table below.

Performance in the Limited-Scope Review Nonmetropolitan South Dakota Assessment Areas			
<i>Assessment Area</i>	<i>Lending Test</i>	<i>Investment Test</i>	<i>Service Test</i>
Belle Fourche	Consistent	Consistent	Consistent
Edgemont	Below	Consistent	Consistent

CRA APPENDIX A

Scope of Evaluation

SCOPE OF EVALUATION FOR LENDING ACTIVITY January 1, 2016, through December 31, 2017	
<i>FINANCIAL INSTITUTION</i>	<i>PRODUCTS REVIEWED</i>
First Interstate Bank	HMDA loans Consumer loans Small business loans Small farm loans
AFFILIATES	
Not applicable	Not applicable
SCOPE OF EVALUATION FOR COMMUNITY DEVELOPMENT ACTIVITY January 1, 2016, through December 31, 2017	

LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EVALUATION</i>	<i>BRANCHES VISITED³⁷</i>	<i>OTHER INFORMATION</i>
Billings MSA, Montana	Full scope	401 North 31st Street	
Great Falls MSA, Montana	Limited scope	None	
Missoula MSA, Montana	Limited scope	None	
Bozeman, Montana	Limited scope	None	
Hamilton, Montana	Limited scope	None	
Hardin/Miles City, Montana	Limited scope	None	
Helena, Montana	Limited scope	None	
Kalispell, Montana	Full scope	None	
Absarokee/Columbus, Montana	Limited scope	None	
Cut Bank, Montana	Limited scope	None	
Ennis, Montana	Limited scope	None	
Casper MSA, Wyoming	Limited scope	None	
Cheyenne MSA, Wyoming	Full scope	None	
Jackson, Wyoming	Limited scope	None	
Laramie, Wyoming	Limited scope	None	
Riverton, Wyoming	Full scope	None	
Sheridan, Wyoming	Limited scope	None	
Rapid City MSA, South Dakota	Full scope	None	
Belle Fourche, South Dakota	Limited scope	None	
Edgemont, South Dakota	Limited scope	None	
Sioux Falls MSA, South Dakota (2016 only)	Limited scope	None	

Note: “Branches visited” indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution’s CRA performance takes into consideration activity from all branch locations, as described in the Scope of Evaluation section of the report.

³⁷There is a statutory requirement that the written evaluation of a multi-state institution’s performance must list the individual branches examined in each state.

CRA APPENDIX B

Summary of State Ratings

<i>State Name</i>	<i>Lending Test Rating</i>	<i>Investment Test Rating</i>	<i>Service Test Rating</i>	<i>Overall State Rating</i>
Montana	Outstanding	Outstanding	High Satisfactory	Outstanding
Wyoming	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
South Dakota	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory

APPENDIX C

Glossary of Common CRA Terms

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 statistical area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. 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 on 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: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) 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 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

Consumer loan: A loan to one or more individuals for household, family, or other personal expenditures. It 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.

Distressed nonmetropolitan middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 data such as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (i.e., approved, denied, or 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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

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 statistical area/assessment area.

Metropolitan statistical area (MSA): An area, defined by the Office of Management and Budget, based on the concept of a core area with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, 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 multistate MSA. 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 MSA, the institution will receive a rating for the multistate metropolitan area.

Small loan to business: A loan included in “loans to small businesses” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or classified as commercial and industrial loans.

Small loan to farm: 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 classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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 geography.

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 28.12.)

2016 Consumer Loan Distribution by Income Level of Borrower Great Falls MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	75	6.1	1.8	20.0
Moderate	3	179	4.5	4.3	18.5
Middle	12	556	18.2	13.2	21.7
Upper	44	3,012	66.7	71.7	39.8
Unknown	3	376	4.5	9.0	0.0
Total	66	4,198	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	10	63	8.1	2.3	22.3
Moderate	22	423	17.9	15.5	17.1
Middle	26	513	21.1	18.8	19.0
Upper	61	1,655	49.6	60.6	41.7
Unknown	4	75	3.3	2.7	0.0
Total	123	2,729	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	74	6.5	2.7	22.3
Moderate	18	222	14.5	8.0	17.1
Middle	28	636	22.6	23.0	19.0
Upper	67	1,803	54.0	65.2	41.7
Unknown	3	31	2.4	1.1	0.0
Total	124	2,766	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	12	52	22.6	8.3	22.3
Moderate	5	16	9.4	2.6	17.1
Middle	7	37	13.2	5.9	19.0
Upper	25	466	47.2	74.6	41.7
Unknown	4	54	7.5	8.6	0.0
Total	53	625	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	34	264	9.3	2.6	NA
Moderate	48	840	13.1	8.1	NA
Middle	73	1,742	19.9	16.9	NA
Upper	197	6,936	53.8	67.2	NA
Unknown	14	536	3.8	5.2	NA
Total	366	10,318	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Great Falls MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	20	2.0	0.7	19.8
Moderate	4	107	7.8	3.5	18.5
Middle	6	322	11.8	10.6	22.1
Upper	33	2,057	64.7	67.8	39.6
Unknown	7	530	13.7	17.5	0.0
Total	51	3,036	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	6	75	6.3	3.8	23.4
Moderate	14	218	14.6	11.0	16.4
Middle	27	614	28.1	30.9	18.2
Upper	49	1,083	51.0	54.4	41.9
Unknown	0	0	0.0	0.0	0.0
Total	96	1,990	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	69	6.8	2.2	23.4
Moderate	17	232	14.4	7.3	16.4
Middle	26	807	22.0	25.5	18.2
Upper	61	1,918	51.7	60.5	41.9
Unknown	6	144	5.1	4.5	0.0
Total	118	3,170	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	9	5.9	2.0	23.4
Moderate	10	63	29.4	14.2	16.4
Middle	8	76	23.5	17.2	18.2
Upper	10	283	29.4	63.9	41.9
Unknown	4	12	11.8	2.7	0.0
Total	34	443	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	17	173	5.7	2.0	NA
Moderate	45	620	15.1	7.2	NA
Middle	67	1,819	22.4	21.1	NA
Upper	153	5,341	51.2	61.8	NA
Unknown	17	686	5.7	7.9	NA
Total	299	8,639	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Great Falls MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	9	614	13.6	14.6	12.5
Middle	28	1,843	42.4	43.9	62.3
Upper	29	1,741	43.9	41.5	25.2
Unknown	0	0	0.0	0.0	0.0
Total	66	4,198	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	19	403	15.4	14.8	21.5
Middle	76	1,631	61.8	59.8	60.6
Upper	28	695	22.8	25.5	17.9
Unknown	0	0	0.0	0.0	0.0
Total	123	2,729	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	25	619	20.2	22.4	21.5
Middle	72	1,508	58.1	54.5	60.6
Upper	27	639	21.8	23.1	17.9
Unknown	0	0	0.0	0.0	0.0
Total	124	2,766	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	10	77	18.9	12.3	21.5
Middle	31	317	58.5	50.7	60.6
Upper	12	231	22.6	37.0	17.9
Unknown	0	0	0.0	0.0	0.0
Total	53	625	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	63	1,713	17.2	16.6	NA
Middle	207	5,299	56.6	51.4	NA
Upper	96	3,306	26.2	32.0	NA
Unknown	0	0	0.0	0.0	NA
Total	366	10,318	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Great Falls MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	10	680	19.6	22.4	12.0
Middle	18	798	35.3	26.3	56.5
Upper	23	1,558	45.1	51.3	31.5
Unknown	0	0	0.0	0.0	0.0
Total	51	3,036	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	14	266	14.6	13.4	19.8
Middle	60	1,223	62.5	61.5	55.5
Upper	22	501	22.9	25.2	24.7
Unknown	0	0	0.0	0.0	0.0
Total	96	1,990	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	11	229	9.3	7.2	19.8
Middle	85	2,075	72.0	65.5	55.5
Upper	22	866	18.6	27.3	24.7
Unknown	0	0	0.0	0.0	0.0
Total	118	3,170	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	4	46	11.8	10.4	19.8
Middle	18	183	52.9	41.3	55.5
Upper	12	214	35.3	48.3	24.7
Unknown	0	0	0.0	0.0	0.0
Total	34	443	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	39	1,221	13.0	14.1	NA
Middle	181	4,279	60.5	49.5	NA
Upper	79	3,139	26.4	36.3	NA
Unknown	0	0	0.0	0.0	NA
Total	299	8,639	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Missoula MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	160	2.0	0.8	20.3
Moderate	11	677	5.6	3.5	17.6
Middle	35	2,697	17.9	14.0	21.2
Upper	138	15,365	70.4	79.5	40.8
Unknown	8	431	4.1	2.2	0.0
Total	196	19,330	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	16	261	7.6	4.8	25.9
Moderate	34	644	16.1	11.9	15.4
Middle	36	809	17.1	14.9	16.5
Upper	123	3,638	58.3	67.1	42.3
Unknown	2	72	0.9	1.3	0.0
Total	211	5,424	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	23	121	13.3	2.8	25.9
Moderate	25	308	14.5	7.3	15.4
Middle	40	504	23.1	11.9	16.5
Upper	70	2,020	40.5	47.6	42.3
Unknown	15	1,294	8.7	30.5	0.0
Total	173	4,247	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	10	66	11.4	2.6	25.9
Moderate	14	75	15.9	3.0	15.4
Middle	15	104	17.0	4.1	16.5
Upper	45	2,261	51.1	89.3	42.3
Unknown	4	27	4.5	1.1	0.0
Total	88	2,533	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	53	608	7.9	1.9	NA
Moderate	84	1,704	12.6	5.4	NA
Middle	126	4,114	18.9	13.0	NA
Upper	376	23,284	56.3	73.8	NA
Unknown	29	1,824	4.3	5.8	NA
Total	668	31,534	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Missoula MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	7	242	3.5	1.2	21.1
Moderate	20	1,301	10.1	6.3	18.2
Middle	40	4,017	20.2	19.4	20.8
Upper	123	14,439	62.1	69.7	39.9
Unknown	8	712	4.0	3.4	0.0
Total	198	20,711	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	11	150	8.0	4.6	24.3
Moderate	32	506	23.2	15.5	16.2
Middle	38	818	27.5	25.1	17.0
Upper	57	1,789	41.3	54.8	42.5
Unknown	0	0	0.0	0.0	0.0
Total	138	3,263	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	29	653	18.6	18.3	24.3
Moderate	28	344	17.9	9.7	16.2
Middle	35	633	22.4	17.8	17.0
Upper	60	1,886	38.5	53.0	42.5
Unknown	4	43	2.6	1.2	0.0
Total	156	3,559	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	20	99	18.5	5.1	24.3
Moderate	21	146	19.4	7.6	16.2
Middle	23	206	21.3	10.7	17.0
Upper	39	1,438	36.1	74.7	42.5
Unknown	5	36	4.6	1.9	0.0
Total	108	1,925	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	67	1,144	11.2	3.9	NA
Moderate	101	2,297	16.8	7.8	NA
Middle	136	5,674	22.7	19.3	NA
Upper	279	19,552	46.5	66.4	NA
Unknown	17	791	2.8	2.7	NA
Total	600	29,458	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Missoula MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	10	1,012	5.1	5.2	12.0
Middle	102	9,064	52.0	46.9	57.0
Upper	84	9,254	42.9	47.9	31.0
Unknown	0	0	0.0	0.0	0.0
Total	196	19,330	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	23	532	10.9	9.8	20.5
Middle	124	3,073	58.8	56.7	55.5
Upper	64	1,819	30.3	33.5	24.0
Unknown	0	0	0.0	0.0	0.0
Total	211	5,424	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	7	51	4.0	1.2	20.5
Middle	112	1,858	64.7	43.7	55.5
Upper	54	2,338	31.2	55.1	24.0
Unknown	0	0	0.0	0.0	0.0
Total	173	4,247	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	12	85	13.6	3.4	20.5
Middle	42	1,031	47.7	40.7	55.5
Upper	34	1,417	38.6	55.9	24.0
Unknown	0	0	0.0	0.0	0.0
Total	88	2,533	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	52	1,680	7.8	5.3	NA
Middle	380	15,026	56.9	47.7	NA
Upper	236	14,828	35.3	47.0	NA
Unknown	0	0	0.0	0.0	NA
Total	668	31,534	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Missoula MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.5
Moderate	8	469	4.0	2.3	12.6
Middle	119	11,777	60.1	56.9	67.3
Upper	71	8,465	35.9	40.9	19.5
Unknown	0	0	0.0	0.0	0.0
Total	198	20,711	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	1	11	0.7	0.3	2.7
Moderate	24	463	17.4	14.2	19.7
Middle	98	2,402	71.0	73.6	60.9
Upper	15	387	10.9	11.9	16.7
Unknown	0	0	0.0	0.0	0.0
Total	138	3,263	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.7
Moderate	21	362	13.5	10.2	19.7
Middle	112	2,396	71.8	67.3	60.9
Upper	23	801	14.7	22.5	16.7
Unknown	0	0	0.0	0.0	0.0
Total	156	3,559	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	9	0.9	0.5	2.7
Moderate	13	78	12.0	4.1	19.7
Middle	71	1,009	65.7	52.4	60.9
Upper	23	829	21.3	43.1	16.7
Unknown	0	0	0.0	0.0	0.0
Total	108	1,925	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	2	20	0.3	0.1	NA
Moderate	66	1,372	11.0	4.7	NA
Middle	400	17,584	66.7	59.7	NA
Upper	132	10,482	22.0	35.6	NA
Unknown	0	0	0.0	0.0	NA
Total	600	29,458	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Bozeman Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	5	405	3.2	3.0	15.4
Moderate	15	851	9.6	6.3	15.8
Middle	43	3,781	27.4	27.8	20.7
Upper	86	8,200	54.8	60.4	48.1
Unknown	8	345	5.1	2.5	0.0
Total	157	13,582	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	40	419	10.5	5.0	18.8
Moderate	65	1,064	17.0	12.8	15.2
Middle	93	1,844	24.3	22.2	19.2
Upper	179	4,844	46.9	58.3	46.8
Unknown	5	141	1.3	1.7	0.0
Total	382	8,312	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	19	219	6.1	3.6	18.8
Moderate	62	701	20.1	11.5	15.2
Middle	68	1,128	22.0	18.5	19.2
Upper	157	4,024	50.8	66.0	46.8
Unknown	3	22	1.0	0.4	0.0
Total	309	6,094	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	21	59	18.3	2.9	18.8
Moderate	27	213	23.5	10.6	15.2
Middle	25	624	21.7	31.1	19.2
Upper	31	916	27.0	45.6	46.8
Unknown	11	195	9.6	9.7	0.0
Total	115	2,007	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	85	1,102	8.8	3.7	NA
Moderate	169	2,829	17.5	9.4	NA
Middle	229	7,377	23.8	24.6	NA
Upper	453	17,984	47.0	60.0	NA
Unknown	27	703	2.8	2.3	NA
Total	963	29,995	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Bozeman Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	2	150	1.4	1.1	13.9
Moderate	18	1573	12.8	11.5	16.4
Middle	29	1704	20.6	12.5	20.4
Upper	82	9479	58.2	69.3	49.3
Unknown	10	766	7.1	5.6	0.0
Total	141	13672	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	22	286	6.0	4.0	19.0
Moderate	74	993	20.3	13.7	14.9
Middle	93	1719	25.5	23.8	17.6
Upper	173	4206	47.4	58.1	48.5
Unknown	3	30	0.8	0.4	0.0
Total	365	7234	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	14	82	4.3	1.3	19.0
Moderate	39	411	11.9	6.4	14.9
Middle	69	935	21.1	14.6	17.6
Upper	198	4856	60.6	76.0	48.5
Unknown	7	104	2.1	1.6	0.0
Total	327	6388	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	32	143	24.1	10.7	19.0
Moderate	29	336	21.8	25.2	14.9
Middle	30	352	22.6	26.4	17.6
Upper	29	419	21.8	31.4	48.5
Unknown	13	85	9.8	6.4	0.0
Total	133	1335	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	70	661	7.2	2.3	NA
Moderate	160	3313	16.6	11.6	NA
Middle	221	4710	22.9	16.5	NA
Upper	482	18960	49.9	66.2	NA
Unknown	33	985	3.4	3.4	NA
Total	966	28629	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Bozeman Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.1
Moderate	23	1,552	14.6	11.4	9.8
Middle	71	6,056	45.2	44.6	44.1
Upper	63	5,974	40.1	44.0	46.1
Unknown	0	0	0.0	0.0	0.0
Total	157	13,582	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	2	14	0.5	0.2	2.3
Moderate	30	429	7.9	5.2	15.0
Middle	212	4,417	55.5	53.1	43.4
Upper	138	3,452	36.1	41.5	39.3
Unknown	0	0	0.0	0.0	0.0
Total	382	8,312	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.3
Moderate	33	565	10.7	9.3	15.0
Middle	162	2,940	52.4	48.2	43.4
Upper	114	2,589	36.9	42.5	39.3
Unknown	0	0	0.0	0.0	0.0
Total	309	6,094	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	23	3.5	1.1	2.3
Moderate	8	175	7.0	8.7	15.0
Middle	49	616	42.6	30.7	43.4
Upper	54	1,193	47.0	59.4	39.3
Unknown	0	0	0.0	0.0	0.0
Total	115	2,007	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	6	37	0.6	0.1	NA
Moderate	94	2,721	9.8	9.1	NA
Middle	494	14,029	51.3	46.8	NA
Upper	369	13,208	38.3	44.0	NA
Unknown	0	0	0.0	0.0	NA
Total	963	29,995	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Bozeman Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.2
Moderate	4	300	2.8	2.2	3.5
Middle	90	8,283	63.8	60.6	41.4
Upper	47	5,089	33.3	37.2	54.9
Unknown	0	0	0.0	0.0	0.0
Total	141	13,672	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	1	11	0.3	0.2	2.2
Moderate	11	142	3.0	2.0	6.8
Middle	196	3,630	53.7	50.2	42.6
Upper	157	3,451	43.0	47.7	48.4
Unknown	0	0	0.0	0.0	0.0
Total	365	7,234	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	13	0.6	0.2	2.2
Moderate	8	68	2.4	1.1	6.8
Middle	153	2,798	46.8	43.8	42.6
Upper	164	3,509	50.2	54.9	48.4
Unknown	0	0	0.0	0.0	0.0
Total	327	6,388	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	21	3.0	1.6	2.2
Moderate	12	90	9.0	6.7	6.8
Middle	48	460	36.1	34.5	42.6
Upper	69	764	51.9	57.2	48.4
Unknown	0	0	0.0	0.0	0.0
Total	133	1,335	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	7	45	0.7	0.2	NA
Moderate	35	600	3.6	2.1	NA
Middle	487	15,171	50.4	53.0	NA
Upper	437	12,813	45.2	44.8	NA
Unknown	0	0	0.0	0.0	NA
Total	966	28,629	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Hamilton Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	2	20	4.7	0.6	22.2
Moderate	4	222	9.3	6.9	16.9
Middle	8	477	18.6	14.7	21.9
Upper	27	2,425	62.8	74.9	38.9
Unknown	2	95	4.7	2.9	0.0
Total	43	3,239	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	5	71	6.1	2.8	24.4
Moderate	12	274	14.6	10.6	16.8
Middle	19	576	23.2	22.4	18.1
Upper	45	1,616	54.9	62.8	40.7
Unknown	1	38	1.2	1.5	0.0
Total	82	2,575	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	16	3.4	1.3	24.4
Moderate	14	171	23.7	13.6	16.8
Middle	13	233	22.0	18.5	18.1
Upper	30	841	50.8	66.7	40.7
Unknown	0	0	0.0	0.0	0.0
Total	59	1,261	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	5	5.3	3.9	24.4
Moderate	5	28	26.3	21.7	16.8
Middle	3	14	15.8	10.9	18.1
Upper	9	76	47.4	58.9	40.7
Unknown	1	6	5.3	4.7	0.0
Total	19	129	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	10	112	4.9	1.6	NA
Moderate	35	695	17.2	9.6	NA
Middle	43	1,300	21.2	18.0	NA
Upper	111	4,958	54.7	68.8	NA
Unknown	4	139	2.0	1.9	NA
Total	203	7,204	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Hamilton Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	150	2.8	5.1	25.1
Moderate	2	117	5.6	4.0	18.4
Middle	7	402	19.4	13.7	21.6
Upper	26	2,267	72.2	77.2	35.0
Unknown	0	0	0.0	0.0	0.0
Total	36	2,936	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	6	62	9.2	3.8	28.4
Moderate	9	178	13.8	10.9	18.4
Middle	16	365	24.6	22.4	16.4
Upper	34	1,022	52.3	62.8	36.8
Unknown	0	0	0.0	0.0	0.0
Total	65	1,627	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	10	2.1	0.9	28.4
Moderate	4	44	8.3	4.2	18.4
Middle	16	365	33.3	34.6	16.4
Upper	27	635	56.3	60.2	36.8
Unknown	0	0	0.0	0.0	0.0
Total	48	1,054	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	17	22.2	12.1	28.4
Moderate	8	55	44.4	39.3	18.4
Middle	2	19	11.1	13.6	16.4
Upper	4	49	22.2	35.0	36.8
Unknown	0	0	0.0	0.0	0.0
Total	18	140	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	12	239	7.2	4.2	NA
Moderate	23	394	13.8	6.8	NA
Middle	41	1,151	24.6	20.0	NA
Upper	91	3,973	54.5	69.0	NA
Unknown	0	0	0.0	0.0	NA
Total	167	5,757	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Hamilton Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	3.1
Middle	35	2,713	81.4	83.8	85.8
Upper	8	526	18.6	16.2	11.1
Unknown	0	0	0.0	0.0	0.0
Total	43	3,239	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	3	115	3.7	4.5	2.5
Middle	68	2,142	82.9	83.2	87.4
Upper	11	318	13.4	12.3	10.1
Unknown	0	0	0.0	0.0	0.0
Total	82	2,575	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	1	29	1.7	2.3	2.5
Middle	52	1,060	88.1	84.1	87.4
Upper	6	172	10.2	13.6	10.1
Unknown	0	0	0.0	0.0	0.0
Total	59	1,261	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	1	15	5.3	11.6	2.5
Middle	13	68	68.4	52.7	87.4
Upper	5	46	26.3	35.7	10.1
Unknown	0	0	0.0	0.0	0.0
Total	19	129	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	5	159	2.5	2.2	NA
Middle	168	5,983	82.8	83.1	NA
Upper	30	1,062	14.8	14.7	NA
Unknown	0	0	0.0	0.0	NA
Total	203	7,204	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Hamilton Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	16	1,454	44.4	49.5	40.0
Middle	18	1,302	50.0	44.3	49.9
Upper	2	180	5.6	6.1	10.1
Unknown	0	0	0.0	0.0	0.0
Total	36	2,936	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	25	525	38.5	32.3	44.7
Middle	28	852	43.1	52.4	46.6
Upper	12	250	18.5	15.4	8.7
Unknown	0	0	0.0	0.0	0.0
Total	65	1,627	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	23	446	47.9	42.3	44.7
Middle	24	596	50.0	56.5	46.6
Upper	1	12	2.1	1.1	8.7
Unknown	0	0	0.0	0.0	0.0
Total	48	1,054	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	7	32	38.9	22.9	44.7
Middle	7	74	38.9	52.9	46.6
Upper	4	34	22.2	24.3	8.7
Unknown	0	0	0.0	0.0	0.0
Total	18	140	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	71	2,457	42.5	42.7	NA
Middle	77	2,824	46.1	49.1	NA
Upper	19	476	11.4	8.3	NA
Unknown	0	0	0.0	0.0	NA
Total	167	5,757	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Borrower Hardin Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	3	62	8.1	2.5	25.2
Moderate	5	298	13.5	12.1	19.6
Middle	9	279	24.3	11.3	20.2
Upper	19	1,741	51.4	70.4	35.1
Unknown	1	93	2.7	3.8	0.0
Total	37	2,473	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	77	928	15.8	9.2	27.2
Moderate	96	1,682	19.7	16.7	16.6
Middle	102	2,094	20.9	20.8	19.4
Upper	209	5,245	42.8	52.2	36.9
Unknown	4	99	0.8	1.0	0.0
Total	488	10,048	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	94	520	23.8	10.2	27.2
Moderate	92	773	23.3	15.1	16.6
Middle	94	1,179	23.8	23.0	19.4
Upper	110	2,516	27.8	49.1	36.9
Unknown	5	135	1.3	2.6	0.0
Total	395	5,123	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	173	343	36.2	19.9	27.2
Moderate	135	392	28.2	22.8	16.6
Middle	97	552	20.3	32.1	19.4
Upper	58	334	12.1	19.4	36.9
Unknown	15	101	3.1	5.9	0.0
Total	478	1,722	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	347	1,853	24.8	9.6	NA
Moderate	328	3,145	23.5	16.2	NA
Middle	302	4,104	21.6	21.2	NA
Upper	396	9,836	28.3	50.8	NA
Unknown	25	428	1.8	2.2	NA
Total	1398	19,366	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Hardin Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	2	223	7.4	13.2	24.0
Moderate	9	274	33.3	16.2	16.9
Middle	3	225	11.1	13.3	19.6
Upper	12	807	44.4	47.7	39.5
Unknown	1	162	3.7	9.6	0.0
Total	27	1,691	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	37	411	11.3	5.7	25.8
Moderate	68	1,073	20.8	14.8	15.4
Middle	73	1,574	22.3	21.8	15.3
Upper	146	4,136	44.6	57.2	43.5
Unknown	3	38	0.9	0.5	0.0
Total	327	7,232	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	54	336	18.2	8.1	25.8
Moderate	58	444	19.5	10.7	15.4
Middle	79	1,230	26.6	29.8	15.3
Upper	102	2,069	34.3	50.1	43.5
Unknown	4	53	1.3	1.3	0.0
Total	297	4,132	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	125	256	34.4	18.9	25.8
Moderate	96	241	26.4	17.8	15.4
Middle	85	300	23.4	22.2	15.3
Upper	46	491	12.7	36.3	43.5
Unknown	11	64	3.0	4.7	0.0
Total	363	1,352	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	218	1,226	21.5	8.5	NA
Moderate	231	2,032	22.8	14.1	NA
Middle	240	3,329	23.7	23.1	NA
Upper	306	7,503	30.2	52.1	NA
Unknown	19	317	1.9	2.2	NA
Total	1014	14,407	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Hardin Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	5	297	13.5	12.0	24.2
Middle	21	1,402	56.8	56.7	61.5
Upper	11	774	29.7	31.3	14.3
Unknown	0	0	0.0	0.0	0.0
Total	37	2,473	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	157	3,155	32.2	31.4	25.5
Middle	252	5,342	51.6	53.2	61.8
Upper	79	1,551	16.2	15.4	12.7
Unknown	0	0	0.0	0.0	0.0
Total	488	10,048	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	114	1,108	28.9	21.6	25.5
Middle	217	2,790	54.9	54.5	61.8
Upper	64	1,225	16.2	23.9	12.7
Unknown	0	0	0.0	0.0	0.0
Total	395	5,123	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	304	862	63.6	50.1	25.5
Middle	111	482	23.2	28.0	61.8
Upper	63	378	13.2	22.0	12.7
Unknown	0	0	0.0	0.0	0.0
Total	478	1,722	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	580	5,422	41.5	28.0	NA
Middle	601	10,016	43.0	51.7	NA
Upper	217	3,928	15.5	20.3	NA
Unknown	0	0	0.0	0.0	NA
Total	1398	19,366	100.0	100.0	0.0

2016 FFIEC Census Data and 2015 ACS Data

2017 Consumer Loan Distribution by Income Level of Geography Hardin Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	2	83	7.4	4.9	16.1
Middle	17	1,333	63.0	78.8	67.0
Upper	8	275	29.6	16.3	17.0
Unknown	0	0	0.0	0.0	0.0
Total	27	1,691	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	58	1,447	17.7	20.0	18.6
Middle	205	4,462	62.7	61.7	67.8
Upper	64	1,323	19.6	18.3	13.6
Unknown	0	0	0.0	0.0	0.0
Total	327	7,232	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	54	739	18.2	17.9	18.6
Middle	182	2,504	61.3	60.6	67.8
Upper	61	889	20.5	21.5	13.6
Unknown	0	0	0.0	0.0	0.0
Total	297	4,132	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	217	527	59.8	39.0	18.6
Middle	98	542	27.0	40.1	67.8
Upper	48	283	13.2	20.9	13.6
Unknown	0	0	0.0	0.0	0.0
Total	363	1,352	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	331	2,796	32.6	19.4	NA
Middle	502	8,841	49.5	61.4	NA
Upper	181	2,770	17.9	19.2	NA
Unknown	0	0	0.0	0.0	NA
Total	1014	14,407	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Helena Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	3	118	6.5	3.0	12.3
Moderate	5	64	10.9	1.6	15.4
Middle	10	1,031	21.7	26.3	20.6
Upper	28	2,708	60.9	69.1	51.7
Unknown	0	0	0.0	0.0	0.0
Total	46	3,921	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	16	138	10.7	4.5	19.0
Moderate	28	347	18.7	11.4	14.0
Middle	40	803	26.7	26.3	18.3
Upper	65	1,737	43.3	57.0	48.7
Unknown	1	24	0.7	0.8	0.0
Total	150	3,049	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	14	79	11.3	3.8	19.0
Moderate	21	209	16.9	10.1	14.0
Middle	28	482	22.6	23.3	18.3
Upper	59	1,257	47.6	60.8	48.7
Unknown	2	40	1.6	1.9	0.0
Total	124	2,067	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	21	11.3	3.0	19.0
Moderate	14	96	19.7	13.7	14.0
Middle	19	124	26.8	17.7	18.3
Upper	18	311	25.4	44.4	48.7
Unknown	12	149	16.9	21.3	0.0
Total	71	701	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	41	356	10.5	3.7	NA
Moderate	68	716	17.4	7.4	NA
Middle	97	2,440	24.8	25.1	NA
Upper	170	6,013	43.5	61.7	NA
Unknown	15	213	3.8	2.2	NA
Total	391	9,738	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Helena Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	144	2.9	4.6	14.8
Moderate	1	25	2.9	0.8	14.5
Middle	5	248	14.7	7.9	22.1
Upper	27	2,718	79.4	86.7	48.6
Unknown	0	0	0.0	0.0	0.0
Total	34	3,135	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	8	117	7.3	5.4	16.7
Moderate	25	320	22.9	14.7	14.4
Middle	32	682	29.4	31.4	17.3
Upper	41	1,010	37.6	46.5	51.6
Unknown	3	44	2.8	2.0	0.0
Total	109	2,173	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	10	83	9.3	3.9	16.7
Moderate	14	117	13.0	5.5	14.4
Middle	27	483	25.0	22.5	17.3
Upper	55	1,422	50.9	66.4	51.6
Unknown	2	38	1.9	1.8	0.0
Total	108	2,143	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	7	44	10.1	4.0	16.7
Moderate	13	78	18.8	7.0	14.4
Middle	11	165	15.9	14.8	17.3
Upper	27	574	39.1	51.6	51.6
Unknown	11	251	15.9	22.6	0.0
Total	69	1,112	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	26	388	8.1	4.5	NA
Moderate	53	540	16.6	6.3	NA
Middle	75	1,578	23.4	18.4	NA
Upper	150	5,724	46.9	66.8	NA
Unknown	16	333	5.0	3.9	NA
Total	320	8,563	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Helena Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	3.1
Middle	20	1,881	43.5	48.0	51.5
Upper	26	2,040	56.5	52.0	45.3
Unknown	0	0	0.0	0.0	0.0
Total	46	3,921	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	2	14	1.3	0.5	3.2
Middle	81	1,727	54.0	56.6	52.2
Upper	67	1,308	44.7	42.9	44.6
Unknown	0	0	0.0	0.0	0.0
Total	150	3,049	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	3	47	2.4	2.3	3.2
Middle	65	1,048	52.4	50.7	52.2
Upper	56	972	45.2	47.0	44.6
Unknown	0	0	0.0	0.0	0.0
Total	124	2,067	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	3.2
Middle	38	384	53.5	54.8	52.2
Upper	33	317	46.5	45.2	44.6
Unknown	0	0	0.0	0.0	0.0
Total	71	701	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	5	61	1.3	0.6	NA
Middle	204	5,040	52.2	51.8	NA
Upper	182	4,637	46.5	47.6	NA
Unknown	0	0	0.0	0.0	NA
Total	391	9,738	100.0	100.0	0.0

2016 FFIEC Census Data and 2015 ACS Data

2017 Consumer Loan Distribution by Income Level of Geography Helena Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	1	50	2.9	1.6	3.5
Middle	19	1,324	55.9	42.2	53.9
Upper	14	1,761	41.2	56.2	42.7
Unknown	0	0	0.0	0.0	0.0
Total	34	3,135	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	5	122	4.6	5.6	3.1
Middle	67	1,288	61.5	59.3	56.0
Upper	37	763	33.9	35.1	40.9
Unknown	0	0	0.0	0.0	0.0
Total	109	2,173	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	3	60	2.8	2.8	3.1
Middle	59	1,112	54.6	51.9	56.0
Upper	46	971	42.6	45.3	40.9
Unknown	0	0	0.0	0.0	0.0
Total	108	2,143	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	1	30	1.4	2.7	3.1
Middle	31	581	44.9	52.2	56.0
Upper	37	501	53.6	45.1	40.9
Unknown	0	0	0.0	0.0	0.0
Total	69	1,112	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	10	262	3.1	3.1	NA
Middle	176	4,305	55.0	50.3	NA
Upper	134	3,996	41.9	46.7	NA
Unknown	0	0	0.0	0.0	NA
Total	320	8,563	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: Absarokee /Columbus

Table with columns for Product Type, Tract Income Levels, Bank Lending & Demographic Data Comparison (2017), Bank & Aggregate Lending Comparison (2016 and 2017), and sub-categories like HOME PURCHASE, REFINANCE, HOME IMPROVEMENT, MULTI FAMILY, HMDA TOTALS, SMALL BUSINESSES, and SMALL FARM.

Originations & Purchases
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Absarokee/Columbus Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	12.8
Moderate	0	0	0.0	0.0	14.8
Middle	1	60	12.5	14.8	21.0
Upper	4	190	50.0	46.8	51.4
Unknown	3	156	37.5	38.4	0.0
Total	8	406	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	6	85	8.6	5.3	16.6
Moderate	9	122	12.9	7.7	13.5
Middle	17	432	24.3	27.1	15.6
Upper	38	955	54.3	59.9	54.2
Unknown	0	0	0.0	0.0	0.0
Total	70	1,594	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	15	118	17.4	7.9	16.6
Moderate	11	158	12.8	10.5	13.5
Middle	9	118	10.5	7.9	15.6
Upper	48	1,071	55.8	71.3	54.2
Unknown	3	37	3.5	2.5	0.0
Total	86	1,502	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	4	13.3	1.4	16.6
Moderate	1	41	6.7	14.4	13.5
Middle	3	51	20.0	17.9	15.6
Upper	4	149	26.7	52.3	54.2
Unknown	5	40	33.3	14.0	0.0
Total	15	285	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	23	207	12.8	5.5	NA
Moderate	21	321	11.7	8.5	NA
Middle	30	661	16.8	17.5	NA
Upper	94	2,365	52.5	62.5	NA
Unknown	11	233	6.1	6.2	NA
Total	179	3,787	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Absarokee /Columbus Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	13.9
Moderate	1	20	9.1	3.3	18.1
Middle	3	127	27.3	20.8	19.0
Upper	5	291	45.5	47.6	48.9
Unknown	2	173	18.2	28.3	0.0
Total	11	611	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	6	77	14.6	7.6	17.1
Moderate	3	107	7.3	10.6	14.9
Middle	10	179	24.4	17.8	15.6
Upper	21	615	51.2	61.1	52.3
Unknown	1	29	2.4	2.9	0.0
Total	41	1,007	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	46	13.8	4.4	17.1
Moderate	6	119	10.3	11.3	14.9
Middle	13	221	22.4	21.0	15.6
Upper	30	659	51.7	62.7	52.3
Unknown	1	6	1.7	0.6	0.0
Total	58	1,051	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	11	8.7	5.4	17.1
Moderate	2	15	8.7	7.3	14.9
Middle	6	32	26.1	15.6	15.6
Upper	7	89	30.4	43.4	52.3
Unknown	6	58	26.1	28.3	0.0
Total	23	205	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	16	134	12.0	4.7	NA
Moderate	12	261	9.0	9.1	NA
Middle	32	559	24.1	19.5	NA
Upper	63	1,654	47.4	57.6	NA
Unknown	10	266	7.5	9.3	NA
Total	133	2,874	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Absarokee/Columbus Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	4	221	50.0	54.4	57.5
Upper	4	185	50.0	45.6	42.5
Unknown	0	0	0.0	0.0	0.0
Total	8	406	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	36	784	51.4	49.2	58.7
Upper	34	810	48.6	50.8	41.3
Unknown	0	0	0.0	0.0	0.0
Total	70	1,594	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	45	687	52.3	45.7	58.7
Upper	41	815	47.7	54.3	41.3
Unknown	0	0	0.0	0.0	0.0
Total	86	1,502	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	6	111	40.0	38.9	58.7
Upper	9	174	60.0	61.1	41.3
Unknown	0	0	0.0	0.0	0.0
Total	15	285	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	91	1,803	50.8	47.6	NA
Upper	88	1,984	49.2	52.4	NA
Unknown	0	0	0.0	0.0	NA
Total	179	3,787	100.0	100.0	0.0

2016 FFIEC Census Data and 2015 ACS Data

2017 Consumer Loan Distribution by Income Level of Geography Absarokee /Columbus Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	8	425	72.7	69.6	68.5
Upper	3	186	27.3	30.4	31.5
Unknown	0	0	0.0	0.0	0.0
Total	11	611	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	27	579	65.9	57.5	68.6
Upper	14	428	34.1	42.5	31.4
Unknown	0	0	0.0	0.0	0.0
Total	41	1,007	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	41	730	70.7	69.5	68.6
Upper	17	321	29.3	30.5	31.4
Unknown	0	0	0.0	0.0	0.0
Total	58	1,051	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	22	201	95.7	98.0	68.6
Upper	1	4	4.3	2.0	31.4
Unknown	0	0	0.0	0.0	0.0
Total	23	205	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	98	1,935	73.7	67.3	NA
Upper	35	939	26.3	32.7	NA
Unknown	0	0	0.0	0.0	NA
Total	133	2,874	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2017 Consumer Loan Distribution by Income Level of Borrower Cutbank, MT nonMSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	20	14.3	4.6	39.5
Moderate	2	70	28.6	16.2	17.6
Middle	2	266	28.6	61.7	14.7
Upper	2	75	28.6	17.4	28.2
Unknown	0	0	0.0	0.0	0.0
Total	7	431	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	7	95	11.3	6.2	40.3
Moderate	16	328	25.8	21.5	17.9
Middle	12	278	19.4	18.2	12.7
Upper	27	826	43.5	54.1	29.1
Unknown	0	0	0.0	0.0	0.0
Total	62	1,527	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	8	66	13.6	6.3	40.3
Moderate	7	103	11.9	9.8	17.9
Middle	18	245	30.5	23.3	12.7
Upper	24	603	40.7	57.3	29.1
Unknown	2	35	3.4	3.3	0.0
Total	59	1,052	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	10	20.0	7.1	40.3
Moderate	3	105	30.0	75.0	17.9
Middle	2	15	20.0	10.7	12.7
Upper	3	10	30.0	7.1	29.1
Unknown	0	0	0.0	0.0	0.0
Total	10	140	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	18	191	13.0	6.1	NA
Moderate	28	606	20.3	19.2	NA
Middle	34	804	24.6	25.5	NA
Upper	56	1,514	40.6	48.1	NA
Unknown	2	35	1.4	1.1	NA
Total	138	3,150	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Cutbank, MT nonMSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	28.1
Moderate	0	0	0.0	0.0	0.0
Middle	7	431	100.0	100.0	71.9
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	7	431	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	14	271	22.6	17.7	39.0
Moderate	0	0	0.0	0.0	0.0
Middle	48	1,256	77.4	82.3	61.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	62	1,527	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	16	229	27.1	21.8	39.0
Moderate	0	0	0.0	0.0	0.0
Middle	43	823	72.9	78.2	61.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	59	1,052	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	39.0
Moderate	0	0	0.0	0.0	0.0
Middle	10	140	100.0	100.0	61.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	10	140	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	30	500	21.7	15.9	NA
Moderate	0	0	0.0	0.0	NA
Middle	108	2,650	78.3	84.1	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	138	3,150	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2017 Consumer Loan Distribution by Income Level of Borrower Ennis, MT nonMSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	30	14.3	8.7	18.7
Moderate	3	215	42.9	62.1	18.8
Middle	1	6	14.3	1.7	23.0
Upper	2	95	28.6	27.5	39.4
Unknown	0	0	0.0	0.0	0.0
Total	7	346	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	19.4
Moderate	9	135	32.1	23.3	22.3
Middle	5	113	17.9	19.5	16.3
Upper	14	332	50.0	57.2	42.1
Unknown	0	0	0.0	0.0	0.0
Total	28	580	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	21	8.7	4.4	19.4
Moderate	3	26	13.0	5.4	22.3
Middle	5	131	21.7	27.3	16.3
Upper	13	302	56.5	62.9	42.1
Unknown	0	0	0.0	0.0	0.0
Total	23	480	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	5	18.2	7.8	19.4
Moderate	2	5	18.2	7.8	22.3
Middle	7	54	63.6	84.4	16.3
Upper	0	0	0.0	0.0	42.1
Unknown	0	0	0.0	0.0	0.0
Total	11	64	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	5	56	7.2	3.8	NA
Moderate	17	381	24.6	25.9	NA
Middle	18	304	26.1	20.7	NA
Upper	29	729	42.0	49.6	NA
Unknown	0	0	0.0	0.0	NA
Total	69	1,470	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography					
Ennis, MT nonMSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	7	346	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	7	346	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	28	580	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	28	580	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	23	480	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	23	480	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	11	64	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	11	64	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	69	1,470	100.0	100.0	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	69	1,470	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Casper MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	175	4.9	2.5	18.6
Moderate	10	908	12.3	12.8	19.3
Middle	15	1,116	18.5	15.7	20.7
Upper	47	4,557	58.0	64.2	41.4
Unknown	5	346	6.2	4.9	0.0
Total	81	7,102	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	22	292	7.8	4.2	21.2
Moderate	59	1,149	21.0	16.4	18.4
Middle	76	2,069	27.0	29.6	18.6
Upper	115	3,303	40.9	47.2	41.8
Unknown	9	182	3.2	2.6	0.0
Total	281	6,995	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	23	185	8.9	3.3	21.2
Moderate	51	678	19.7	11.9	18.4
Middle	56	1,169	21.6	20.6	18.6
Upper	120	3,511	46.3	61.8	41.8
Unknown	9	140	3.5	2.5	0.0
Total	259	5,683	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	9	38	22.5	9.7	21.2
Moderate	6	41	15.0	10.5	18.4
Middle	6	48	15.0	12.3	18.6
Upper	11	119	27.5	30.5	41.8
Unknown	8	144	20.0	36.9	0.0
Total	40	390	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	58	690	8.8	3.4	NA
Moderate	126	2,776	19.1	13.8	NA
Middle	153	4,402	23.1	21.8	NA
Upper	293	11,490	44.3	57.0	NA
Unknown	31	812	4.7	4.0	NA
Total	661	20,170	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Casper MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	240	1.6	4.0	21.1
Moderate	8	1,024	12.9	17.2	16.4
Middle	12	1,052	19.4	17.6	21.7
Upper	36	2,983	58.1	50.0	40.7
Unknown	5	666	8.1	11.2	0.0
Total	62	5,965	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	23	368	9.9	6.3	22.9
Moderate	38	829	16.4	14.2	16.6
Middle	67	1,552	28.9	26.5	18.8
Upper	100	3,046	43.1	52.0	41.7
Unknown	4	58	1.7	1.0	0.0
Total	232	5,853	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	12	143	6.9	3.9	22.9
Moderate	25	349	14.3	9.4	16.6
Middle	46	878	26.3	23.7	18.8
Upper	86	2,245	49.1	60.6	41.7
Unknown	6	90	3.4	2.4	0.0
Total	175	3,705	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	16	76	24.2	13.2	22.9
Moderate	12	92	18.2	15.9	16.6
Middle	16	101	24.2	17.5	18.8
Upper	17	272	25.8	47.1	41.7
Unknown	5	36	7.6	6.2	0.0
Total	66	577	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	52	827	9.7	5.1	NA
Moderate	83	2,294	15.5	14.2	NA
Middle	141	3,583	26.4	22.3	NA
Upper	239	8,546	44.7	53.1	NA
Unknown	20	850	3.7	5.3	NA
Total	535	16,100	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Casper MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	8	562	9.9	7.9	16.1
Middle	40	3,564	49.4	50.2	55.4
Upper	33	2,976	40.7	41.9	28.5
Unknown	0	0	0.0	0.0	0.0
Total	81	7,102	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	28	605	10.0	8.6	19.3
Middle	151	3,862	53.7	55.2	54.8
Upper	102	2,528	36.3	36.1	25.8
Unknown	0	0	0.0	0.0	0.0
Total	281	6,995	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	30	595	11.6	10.5	19.3
Middle	123	2,580	47.5	45.4	54.8
Upper	106	2,508	40.9	44.1	25.8
Unknown	0	0	0.0	0.0	0.0
Total	259	5,683	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	5	14	12.5	3.6	19.3
Middle	22	167	55.0	42.8	54.8
Upper	13	209	32.5	53.6	25.8
Unknown	0	0	0.0	0.0	0.0
Total	40	390	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	71	1,776	10.7	8.8	NA
Middle	336	10,173	50.8	50.4	NA
Upper	254	8,221	38.4	40.8	NA
Unknown	0	0	0.0	0.0	NA
Total	661	20,170	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Casper MSA Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	1	9	1.6	0.2	4.0
Moderate	5	736	8.1	12.3	10.2
Middle	42	3,758	67.7	63.0	68.1
Upper	14	1,462	22.6	24.5	17.7
Unknown	0	0	0.0	0.0	0.0
Total	62	5,965	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	5	93	2.2	1.6	6.7
Moderate	22	530	9.5	9.1	11.4
Middle	160	3,853	69.0	65.8	68.2
Upper	45	1,377	19.4	23.5	13.7
Unknown	0	0	0.0	0.0	0.0
Total	232	5,853	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	2	40	1.1	1.1	6.7
Moderate	27	446	15.4	12.0	11.4
Middle	121	2,634	69.1	71.1	68.2
Upper	25	585	14.3	15.8	13.7
Unknown	0	0	0.0	0.0	0.0
Total	175	3,705	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	3	10	4.5	1.7	6.7
Moderate	10	79	15.2	13.7	11.4
Middle	46	401	69.7	69.5	68.2
Upper	7	87	10.6	15.1	13.7
Unknown	0	0	0.0	0.0	0.0
Total	66	577	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	11	152	2.1	0.9	NA
Moderate	64	1,791	12.0	11.1	NA
Middle	369	10,646	69.0	66.1	NA
Upper	91	3,511	17.0	21.8	NA
Unknown	0	0	0.0	0.0	NA
Total	535	16,100	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Borrower Jackson Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	10.7
Moderate	4	415	10.8	4.7	12.6
Middle	9	1,392	24.3	15.8	20.7
Upper	23	6,901	62.2	78.5	56.0
Unknown	1	78	2.7	0.9	0.0
Total	37	8,786	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	6	69	13.0	6.0	13.8
Moderate	6	97	13.0	8.5	13.8
Middle	13	335	28.3	29.3	18.1
Upper	20	596	43.5	52.2	54.3
Unknown	1	45	2.2	3.9	0.0
Total	46	1,142	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	217	9.5	23.4	13.8
Moderate	14	156	33.3	16.8	13.8
Middle	7	126	16.7	13.6	18.1
Upper	14	193	33.3	20.8	54.3
Unknown	3	235	7.1	25.4	0.0
Total	42	927	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	5	17	26.3	8.1	13.8
Moderate	4	22	21.1	10.4	13.8
Middle	6	110	31.6	52.1	18.1
Upper	3	32	15.8	15.2	54.3
Unknown	1	30	5.3	14.2	0.0
Total	19	211	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	15	303	10.4	2.7	NA
Moderate	28	690	19.4	6.2	NA
Middle	35	1,963	24.3	17.7	NA
Upper	60	7,722	41.7	69.8	NA
Unknown	6	388	4.2	3.5	NA
Total	144	11,066	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Jackson Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	10.4
Moderate	1	50	2.0	0.5	12.5
Middle	8	608	16.0	6.7	22.3
Upper	40	8,447	80.0	92.6	54.8
Unknown	1	20	2.0	0.2	0.0
Total	50	9,125	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	5	88	12.2	10.5	13.5
Moderate	14	224	34.1	26.7	14.4
Middle	5	140	12.2	16.7	18.1
Upper	17	387	41.5	46.1	54.0
Unknown	0	0	0.0	0.0	0.0
Total	41	839	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	7	107	18.4	12.3	13.5
Moderate	10	108	26.3	12.4	14.4
Middle	6	67	15.8	7.7	18.1
Upper	14	338	36.8	38.9	54.0
Unknown	1	250	2.6	28.7	0.0
Total	38	870	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	6	34	26.1	12.3	13.5
Moderate	5	57	21.7	20.7	14.4
Middle	8	126	34.8	45.7	18.1
Upper	3	50	13.0	18.1	54.0
Unknown	1	9	4.3	3.3	0.0
Total	23	276	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	18	229	11.8	2.1	NA
Moderate	30	439	19.7	4.0	NA
Middle	27	941	17.8	8.5	NA
Upper	74	9,222	48.7	83.0	NA
Unknown	3	279	2.0	2.5	NA
Total	152	11,110	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Jackson Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	2	400	5.4	4.6	7.8
Upper	35	8,386	94.6	95.4	92.2
Unknown	0	0	0.0	0.0	0.0
Total	37	8,786	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	5	165	10.9	14.4	10.9
Upper	41	977	89.1	85.6	89.1
Unknown	0	0	0.0	0.0	0.0
Total	46	1,142	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	6	42	14.3	4.5	10.9
Upper	36	885	85.7	95.5	89.1
Unknown	0	0	0.0	0.0	0.0
Total	42	927	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	10.9
Upper	19	211	100.0	100.0	89.1
Unknown	0	0	0.0	0.0	0.0
Total	19	211	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	13	607	9.0	5.5	NA
Upper	131	10,459	91.0	94.5	NA
Unknown	0	0	0.0	0.0	NA
Total	144	11,066	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Jackson Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	26	4,105	52.0	45.0	39.5
Upper	24	5,020	48.0	55.0	60.5
Unknown	0	0	0.0	0.0	0.0
Total	50	9,125	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	20	464	48.8	55.3	45.8
Upper	21	375	51.2	44.7	54.2
Unknown	0	0	0.0	0.0	0.0
Total	41	839	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	18	542	47.4	62.3	45.8
Upper	20	328	52.6	37.7	54.2
Unknown	0	0	0.0	0.0	0.0
Total	38	870	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	13	180	56.5	65.2	45.8
Upper	10	96	43.5	34.8	54.2
Unknown	0	0	0.0	0.0	0.0
Total	23	276	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	77	5,291	50.7	47.6	NA
Upper	75	5,819	49.3	52.4	NA
Unknown	0	0	0.0	0.0	NA
Total	152	11,110	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: Laramie

Table with 18 columns: PRODUCT TYPE, Tract Income Levels, Bank Lending & Demographic Data Comparison (2017), Bank & Aggregate Lending Comparison (2016, 2017). Rows include HOME PURCHASE, REFINANCE, HOME IMPROVEMENT, MULTI FAMILY, HMDA TOTALS, SMALL BUSINESSES, and SMALL FARM.

Originations & Purchases
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Laramie Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	4	281	9.5	7.2	20.3
Moderate	4	96	9.5	2.5	16.5
Middle	11	781	26.2	20.1	21.8
Upper	20	2,400	47.6	61.7	41.3
Unknown	3	332	7.1	8.5	0.0
Total	42	3,890	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	17	200	15.0	6.8	34.4
Moderate	19	450	16.8	15.3	16.4
Middle	25	743	22.1	25.3	15.8
Upper	47	1,460	41.6	49.7	33.5
Unknown	5	87	4.4	3.0	0.0
Total	113	2,940	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	10	107	24.4	14.1	34.4
Moderate	9	100	22.0	13.1	16.4
Middle	9	224	22.0	29.4	15.8
Upper	12	309	29.3	40.6	33.5
Unknown	1	21	2.4	2.8	0.0
Total	41	761	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	9	85	22.5	13.8	34.4
Moderate	9	73	22.5	11.8	16.4
Middle	9	183	22.5	29.7	15.8
Upper	11	253	27.5	41.0	33.5
Unknown	2	23	5.0	3.7	0.0
Total	40	617	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	40	673	16.9	8.2	NA
Moderate	41	719	17.4	8.8	NA
Middle	54	1,931	22.9	23.5	NA
Upper	90	4,422	38.1	53.9	NA
Unknown	11	463	4.7	5.6	NA
Total	236	8,208	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Laramie Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	20	2.0	0.5	26.7
Moderate	11	1,033	22.4	25.8	16.5
Middle	8	633	16.3	15.8	21.1
Upper	26	2,222	53.1	55.5	35.7
Unknown	3	97	6.1	2.4	0.0
Total	49	4,005	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	8	98	23.5	14.6	38.6
Moderate	6	119	17.6	17.8	15.1
Middle	7	151	20.6	22.5	17.6
Upper	11	264	32.4	39.4	28.7
Unknown	2	38	5.9	5.7	0.0
Total	34	670	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	3	46	9.7	6.3	38.6
Moderate	5	65	16.1	9.0	15.1
Middle	4	111	12.9	15.3	17.6
Upper	16	472	51.6	65.0	28.7
Unknown	3	32	9.7	4.4	0.0
Total	31	726	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	11	35	31.4	11.7	38.6
Moderate	11	59	31.4	19.8	15.1
Middle	4	37	11.4	12.4	17.6
Upper	7	148	20.0	49.7	28.7
Unknown	2	19	5.7	6.4	0.0
Total	35	298	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	23	199	15.4	3.5	NA
Moderate	33	1,276	22.1	22.4	NA
Middle	23	932	15.4	16.4	NA
Upper	60	3,106	40.3	54.5	NA
Unknown	10	186	6.7	3.3	NA
Total	149	5,699	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Laramie Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.1
Moderate	4	215	9.5	5.5	17.3
Middle	25	2,628	59.5	67.6	51.7
Upper	13	1,047	31.0	26.9	30.9
Unknown	0	0	0.0	0.0	0.0
Total	42	3,890	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.4
Moderate	11	194	9.7	6.6	26.9
Middle	69	1,871	61.1	63.6	45.8
Upper	33	875	29.2	29.8	24.9
Unknown	0	0	0.0	0.0	0.0
Total	113	2,940	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	2.4
Moderate	8	122	19.5	16.0	26.9
Middle	24	487	58.5	64.0	45.8
Upper	9	152	22.0	20.0	24.9
Unknown	0	0	0.0	0.0	0.0
Total	41	761	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	2	2.5	0.3	2.4
Moderate	8	47	20.0	7.6	26.9
Middle	20	358	50.0	58.0	45.8
Upper	11	210	27.5	34.0	24.9
Unknown	0	0	0.0	0.0	0.0
Total	40	617	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	1	2	0.4	0.0	NA
Moderate	31	578	13.1	7.0	NA
Middle	138	5,344	58.5	65.1	NA
Upper	66	2,284	28.0	27.8	NA
Unknown	0	0	0.0	0.0	NA
Total	236	8,208	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Laramie Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	3	258	6.1	6.4	3.4
Moderate	2	75	4.1	1.9	5.5
Middle	44	3,672	89.8	91.7	91.1
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	49	4,005	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	3	64	8.8	9.6	9.4
Moderate	5	76	14.7	11.3	11.9
Middle	26	530	76.5	79.1	78.7
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	34	670	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	36	12.9	5.0	9.4
Moderate	3	77	9.7	10.6	11.9
Middle	24	613	77.4	84.4	78.7
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	31	726	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	4	43	11.4	14.4	9.4
Moderate	5	37	14.3	12.4	11.9
Middle	26	218	74.3	73.2	78.7
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	35	298	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	14	401	9.4	7.0	NA
Moderate	15	265	10.1	4.6	NA
Middle	120	5,033	80.5	88.3	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	149	5,699	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Sheridan Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	16	942	9.9	7.2	16.3
Moderate	20	1,535	12.3	11.7	17.1
Middle	41	2,768	25.3	21.2	21.6
Upper	77	7,542	47.5	57.7	45.1
Unknown	8	291	4.9	2.2	0.0
Total	162	13,078	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	79	1,173	9.8	5.2	18.9
Moderate	112	2,205	13.8	9.8	14.8
Middle	249	6,878	30.7	30.6	19.5
Upper	362	11,970	44.7	53.3	46.9
Unknown	8	231	1.0	1.0	0.0
Total	810	22,457	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	71	846	14.1	8.1	18.9
Moderate	83	1,320	16.5	12.6	14.8
Middle	147	2,826	29.2	26.9	19.5
Upper	188	5,158	37.3	49.1	46.9
Unknown	15	358	3.0	3.4	0.0
Total	504	10,508	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	24	87	14.2	6.3	18.9
Moderate	16	66	9.5	4.8	14.8
Middle	29	318	17.2	22.9	19.5
Upper	39	505	23.1	36.4	46.9
Unknown	61	410	36.1	29.6	0.0
Total	169	1,386	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	190	3,048	11.6	6.4	NA
Moderate	231	5,126	14.0	10.8	NA
Middle	466	12,790	28.3	27.0	NA
Upper	666	25,175	40.5	53.1	NA
Unknown	92	1,290	5.6	2.7	NA
Total	1,645	47,429	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Sheridan Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	12	610	8.6	6.0	16.7
Moderate	18	1,167	12.9	11.5	16.0
Middle	32	2,240	22.9	22.0	22.4
Upper	70	5,750	50.0	56.5	44.9
Unknown	8	402	5.7	4.0	0.0
Total	140	10,169	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	78	1,171	10.5	5.9	19.3
Moderate	111	2,515	15.0	12.6	15.2
Middle	191	5,077	25.7	25.4	17.8
Upper	357	11,127	48.1	55.7	47.6
Unknown	5	69	0.7	0.3	0.0
Total	742	19,959	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	57	485	12.6	5.1	19.3
Moderate	69	1,103	15.2	11.5	15.2
Middle	124	2,597	27.3	27.2	17.8
Upper	196	5,266	43.2	55.1	47.6
Unknown	8	106	1.8	1.1	0.0
Total	454	9,557	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	19	123	10.9	7.8	19.3
Moderate	20	113	11.4	7.2	15.2
Middle	45	316	25.7	20.1	17.8
Upper	47	628	26.9	40.0	47.6
Unknown	44	391	25.1	24.9	0.0
Total	175	1,571	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	166	2,389	11.0	5.8	NA
Moderate	218	4,898	14.4	11.9	NA
Middle	392	10,230	25.9	24.8	NA
Upper	670	22,771	44.3	55.2	NA
Unknown	65	968	4.3	2.3	NA
Total	1511	41,256	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Sheridan Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	14	741	8.6	5.7	6.2
Middle	137	11,714	84.6	89.6	77.0
Upper	11	623	6.8	4.8	16.8
Unknown	0	0	0.0	0.0	0.0
Total	162	13,078	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	23	610	2.8	2.7	7.1
Middle	578	15,261	71.4	68.0	78.3
Upper	209	6,586	25.8	29.3	14.6
Unknown	0	0	0.0	0.0	0.0
Total	810	22,457	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	18	324	3.6	3.1	7.1
Middle	395	7,878	78.4	75.0	78.3
Upper	91	2,306	18.1	21.9	14.6
Unknown	0	0	0.0	0.0	0.0
Total	504	10,508	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	3	12	1.8	0.9	7.1
Middle	125	1,068	74.0	77.1	78.3
Upper	41	306	24.3	22.1	14.6
Unknown	0	0	0.0	0.0	0.0
Total	169	1,386	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	58	1,687	3.5	3.6	NA
Middle	1235	35,921	75.1	75.7	NA
Upper	352	9,821	21.4	20.7	NA
Unknown	0	0	0.0	0.0	NA
Total	1645	47,429	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography Sheridan Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	130	9,603	92.9	94.4	67.3
Upper	10	566	7.1	5.6	32.7
Unknown	0	0	0.0	0.0	0.0
Total	140	10,169	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	422	10,553	56.9	52.9	68.6
Upper	320	9,406	43.1	47.1	31.4
Unknown	0	0	0.0	0.0	0.0
Total	742	19,959	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	304	6,281	67.0	65.7	68.6
Upper	150	3,276	33.0	34.3	31.4
Unknown	0	0	0.0	0.0	0.0
Total	454	9,557	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	92	892	52.6	56.8	68.6
Upper	83	679	47.4	43.2	31.4
Unknown	0	0	0.0	0.0	0.0
Total	175	1,571	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	948	27,329	62.7	66.2	NA
Upper	563	13,927	37.3	33.8	NA
Unknown	0	0	0.0	0.0	NA
Total	1511	41,256	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Borrower Belle Fourche Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	2	74	1.8	0.9	18.6
Moderate	12	455	10.5	5.4	17.7
Middle	24	1,654	21.1	19.6	21.8
Upper	68	5,230	59.6	62.0	41.9
Unknown	8	1,017	7.0	12.1	0.0
Total	114	8,430	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	42	437	7.7	3.8	24.6
Moderate	74	1,320	13.5	11.3	16.9
Middle	152	2,861	27.8	24.6	15.8
Upper	271	6,899	49.5	59.2	42.7
Unknown	8	129	1.5	1.1	0.0
Total	547	11,646	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	42	207	15.4	4.2	24.6
Moderate	51	481	18.8	9.8	16.9
Middle	64	880	23.5	17.9	15.8
Upper	108	2,903	39.7	59.1	42.7
Unknown	7	438	2.6	8.9	0.0
Total	272	4,909	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	3	8	15.0	2.8	24.6
Moderate	6	30	30.0	10.6	16.9
Middle	3	5	15.0	1.8	15.8
Upper	5	143	25.0	50.5	42.7
Unknown	3	97	15.0	34.3	0.0
Total	20	283	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	89	726	9.3	2.9	NA
Moderate	143	2,286	15.0	9.0	NA
Middle	243	5,400	25.5	21.4	NA
Upper	452	15,175	47.4	60.1	NA
Unknown	26	1,681	2.7	6.7	NA
Total	953	25,268	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Belle Fourche Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	3	215	3.0	2.2	17.9
Moderate	11	1,040	10.9	10.8	20.3
Middle	16	1,464	15.8	15.2	19.7
Upper	65	6,678	64.4	69.2	42.1
Unknown	6	258	5.9	2.7	0.0
Total	101	9,655	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	42	528	9.9	5.9	25.0
Moderate	79	1,415	18.7	15.8	17.2
Middle	94	1,569	22.2	17.5	17.6
Upper	208	5,430	49.2	60.7	40.1
Unknown	0	0	0.0	0.0	0.0
Total	423	8,942	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	43	243	18.6	6.8	25.0
Moderate	46	481	19.9	13.5	17.2
Middle	50	683	21.6	19.2	17.6
Upper	89	2,080	38.5	58.4	40.1
Unknown	3	77	1.3	2.2	0.0
Total	231	3,564	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	12	46	6.7	3.2	25.0
Moderate	17	107	9.4	7.4	17.2
Middle	11	107	6.1	7.4	17.6
Upper	14	278	7.8	19.2	40.1
Unknown	126	907	70.0	62.8	0.0
Total	180	1,445	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	100	1,032	10.7	4.4	NA
Moderate	153	3,043	16.4	12.9	NA
Middle	171	3,823	18.3	16.2	NA
Upper	376	14,466	40.2	61.3	NA
Unknown	135	1,242	14.4	5.3	NA
Total	935	23,606	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Belle Fourche Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	5	265	4.4	3.1	9.2
Middle	66	4,433	57.9	52.6	58.9
Upper	43	3,732	37.7	44.3	31.9
Unknown	0	0	0.0	0.0	0.0
Total	114	8,430	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	57	1,130	10.4	9.7	7.8
Middle	313	6,328	57.2	54.3	61.5
Upper	177	4,188	32.4	36.0	30.7
Unknown	0	0	0.0	0.0	0.0
Total	547	11,646	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	23	343	8.5	7.0	7.8
Middle	159	2,266	58.5	46.2	61.5
Upper	90	2,300	33.1	46.9	30.7
Unknown	0	0	0.0	0.0	0.0
Total	272	4,909	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	7.8
Middle	15	170	75.0	60.1	61.5
Upper	5	113	25.0	39.9	30.7
Unknown	0	0	0.0	0.0	0.0
Total	20	283	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	85	1,738	8.9	6.9	NA
Middle	553	13,197	58.0	52.2	NA
Upper	315	10,333	33.1	40.9	NA
Unknown	0	0	0.0	0.0	NA
Total	953	25,268	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography					
Belle Fourche Assessment Area					
Census Tract Income Level	Home Equity Loans				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	72	6,127	71.3	63.5	79.5
Upper	29	3,528	28.7	36.5	20.5
Unknown	0	0	0.0	0.0	0.0
Total	101	9,655	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	344	7,303	81.3	81.7	81.7
Upper	79	1,639	18.7	18.3	18.3
Unknown	0	0	0.0	0.0	0.0
Total	423	8,942	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	179	2,763	77.5	77.5	81.7
Upper	52	801	22.5	22.5	18.3
Unknown	0	0	0.0	0.0	0.0
Total	231	3,564	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	146	1,023	81.1	70.8	81.7
Upper	34	422	18.9	29.2	18.3
Unknown	0	0	0.0	0.0	0.0
Total	180	1,445	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	741	17,216	79.3	72.9	NA
Upper	194	6,390	20.7	27.1	NA
Unknown	0	0	0.0	0.0	NA
Total	935	23,606	100.0	100.0	0.0

2017 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: Edgemont

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank		Dollar		Families by Family Income %	Count		Dollar		Agg	Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	\$ (000s)	\$ %	
HOME PURCHASE	Low	2	14.3%	\$152	8.7%	18.4%	0	0.0%	4.3%	\$0	0.0%	2.3%	2	14.3%	10.2%	\$152	8.7%	5.7%
	Moderate	3	21.4%	\$292	16.6%	19.2%	1	11.1%	20.3%	\$122	7.7%	14.2%	3	21.4%	19.7%	\$292	16.6%	17.2%
	Middle	2	14.3%	\$199	11.3%	23.9%	3	33.3%	27.5%	\$449	28.4%	26.8%	2	14.3%	22.0%	\$199	11.3%	23.2%
	Upper	6	42.9%	\$1,049	59.8%	38.4%	5	55.6%	33.3%	\$1,008	63.8%	40.9%	6	42.9%	29.1%	\$1,049	59.8%	35.8%
	Unknown	1	7.1%	\$63	3.6%	0.0%	0	0.0%	14.5%	\$0	0.0%	15.7%	1	7.1%	18.9%	\$63	3.6%	18.0%
	Total	14	100.0%	\$1,755	100.0%	100.0%	9	100.0%	100.0%	\$1,579	100.0%	100.0%	14	100.0%	100.0%	\$1,755	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	18.4%	2	28.6%	8.2%	\$211	19.4%	3.3%	0	0.0%	5.1%	\$0	0.0%	2.8%
	Moderate	1	50.0%	\$27	17.5%	19.2%	0	0.0%	11.5%	\$0	0.0%	6.4%	1	50.0%	20.5%	\$27	17.5%	15.6%
	Middle	1	50.0%	\$127	82.5%	23.9%	1	14.3%	14.8%	\$107	9.8%	11.6%	1	50.0%	30.8%	\$127	82.5%	27.7%
	Upper	0	0.0%	\$0	0.0%	38.4%	4	57.1%	47.5%	\$769	70.7%	55.2%	0	0.0%	17.9%	\$0	0.0%	24.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	23.5%	0	0.0%	25.6%	\$0	0.0%	29.4%
	Total	2	100.0%	\$154	100.0%	100.0%	7	100.0%	100.0%	\$1,087	100.0%	100.0%	2	100.0%	100.0%	\$154	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.4%	1	20.0%	8.3%	\$1	1.5%	0.2%	0	0.0%	14.3%	\$0	0.0%	8.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	3	60.0%	41.7%	\$59	90.8%	28.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	50.0%	\$4	2.7%	23.9%	1	20.0%	16.7%	\$5	7.7%	10.9%	1	50.0%	35.7%	\$4	2.7%	34.6%
	Upper	1	50.0%	\$143	97.3%	38.4%	0	0.0%	16.7%	\$0	0.0%	45.0%	1	50.0%	42.9%	\$143	97.3%	54.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	15.9%	0	0.0%	7.1%	\$0	0.0%	2.9%
	Total	2	100.0%	\$147	100.0%	100.0%	5	100.0%	100.0%	\$65	100.0%	100.0%	2	100.0%	100.0%	\$147	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	2	11.1%	\$152	7.4%	18.4%	3	14.3%	6.3%	\$212	7.8%	2.7%	2	11.1%	9.4%	\$152	7.4%	5.2%
	Moderate	4	22.2%	\$319	15.5%	19.2%	4	19.0%	18.3%	\$181	6.6%	10.6%	4	22.2%	18.3%	\$319	15.5%	15.7%
	Middle	4	22.2%	\$330	16.1%	23.9%	5	23.8%	21.1%	\$561	20.5%	18.6%	4	22.2%	25.0%	\$330	16.1%	25.0%
	Upper	7	38.9%	\$1,192	58.0%	38.4%	9	42.9%	38.0%	\$1,777	65.1%	48.4%	7	38.9%	27.8%	\$1,192	58.0%	34.5%
	Unknown	1	5.6%	\$63	3.1%	0.0%	0	0.0%	16.2%	\$0	0.0%	19.7%	1	5.6%	19.4%	\$63	3.1%	19.6%
	Total	18	100.0%	\$2,056	100.0%	100.0%	21	100.0%	100.0%	\$2,731	100.0%	100.0%	18	100.0%	100.0%	\$2,056	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	20	76.9%	\$743	52.4%	92.7%	30	69.8%	53.7%	\$2,430	75.6%	62.8%	20	76.9%	55.8%	\$743	52.4%	35.6%
	Over \$1 Million	5	19.2%	\$446	31.4%	4.2%	9	20.9%					5	19.2%				
	Total Rev. available	25	96.1%	\$1,189	83.8%	96.9%	39	90.7%					25	96.1%				
	Rev. Not Known	1	3.8%	\$230	16.2%	3.1%	4	9.3%					1	3.8%				
	Total	26	100.0%	\$1,419	100.0%	100.0%	43	100.0%					26	100.0%				
Small Business Loan Size	Total Businesses																	
	\$100,000 or Less	21	80.8%	\$490	34.5%		35	81.4%	91.0%	\$1,043	32.5%	42.6%	21	80.8%	91.2%	\$490	34.5%	37.4%
	\$100,001 - \$250,000	5	19.2%	\$929	65.5%		5	11.6%	5.2%	\$673	20.9%	19.0%	5	19.2%	6.2%	\$929	65.5%	25.9%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		3	7.0%	3.7%	\$1,498	46.6%	38.5%	0	0.0%	2.7%	\$0	0.0%	36.7%
	Total	26	100.0%	\$1,419	100.0%		43	100.0%	100.0%	\$3,214	100.0%	100.0%	26	100.0%	100.0%	\$1,419	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		20	83.3%	\$769	71.0%	97.8%	21	84.0%	79.5%	\$866	84.8%	79.4%	20	83.3%	79.4%	\$769	71.0%	71.5%
Over \$1 Million		0	0.0%	\$0	0.0%	2.2%	0	0.0%					0	0.0%				
Not Known		4	16.7%	\$314	29.0%	0.0%	4	16.0%					4	16.7%				
Total		24	100.0%	\$1,083	100.0%	100.0%	25	100.0%					24	100.0%				
Small Farm Loan Size		Total Farms																
	\$100,000 or Less	22	91.7%	\$641	59.2%		23	92.0%	81.8%	\$800	78.4%	37.7%	22	91.7%	85.3%	\$641	59.2%	44.7%
	\$100,001 - \$250,000	1	4.2%	\$167	15.4%		2	8.0%	9.1%	\$221	21.6%	15.0%	1	4.2%	11.8%	\$167	15.4%	41.4%
	\$250,001 - \$500,000	1	4.2%	\$275	25.4%		0	0.0%	9.1%	\$0	0.0%	47.3%	1	4.2%	2.9%	\$275	25.4%	13.9%
	Total	24	100.0%	\$1,083	100.0%		25	100.0%	100.0%	\$1,021	100.0%	100.0%	24	100.0%	100.0%	\$1,083	100.0%	100.0%

Originations & Purchases
 Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
 2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans
Assessment Area: Edgemont

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2017					2016					2017						
		Bank		Owner Occupied Units		%	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	14	100.0%	\$1,755	100.0%	100.0%	9	100.0%	100.0%	\$1,579	100.0%	100.0%	14	100.0%	100.0%	\$1,755	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,755	100.0%	100.0%	9	100.0%	100.0%	\$1,579	100.0%	100.0%	14	100.0%	100.0%	\$1,755	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$154	100.0%	100.0%	7	100.0%	100.0%	\$1,087	100.0%	100.0%	2	100.0%	100.0%	\$154	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$154	100.0%	100.0%	7	100.0%	100.0%	\$1,087	100.0%	100.0%	2	100.0%	100.0%	\$154	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$147	100.0%	100.0%	5	100.0%	100.0%	\$65	100.0%	100.0%	2	100.0%	100.0%	\$147	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$147	100.0%	100.0%	5	100.0%	100.0%	\$65	100.0%	100.0%	2	100.0%	100.0%	\$147	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	18	100.0%	\$2,056	100.0%	100.0%	21	100.0%	100.0%	\$2,731	100.0%	100.0%	18	100.0%	100.0%	\$2,056	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$2,056	100.0%	100.0%	21	100.0%	100.0%	\$2,731	100.0%	100.0%	18	100.0%	100.0%	\$2,056	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	26	100.0%	\$1,419	100.0%	100.0%	43	100.0%	92.5%	\$3,214	100.0%	95.9%	26	100.0%	92.9%	\$1,419	100.0%	94.9%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$1,419	100.0%	100.0%	43	100.0%	100.0%	\$3,214	100.0%	100.0%	26	100.0%	100.0%	\$1,419	100.0%	100.0%
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	24	100.0%	\$1,083	100.0%	100.0%	25	100.0%	97.7%	\$1,021	100.0%	99.9%	24	100.0%	100.0%	\$1,083	100.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	24	100.0%	\$1,083	100.0%	100.0%	25	100.0%	100.0%	\$1,021	100.0%	100.0%	24	100.0%	100.0%	\$1,083	100.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

2016 Consumer Loan Distribution by Income Level of Borrower Edgemont Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	24.9
Moderate	2	89	13.3	10.0	11.6
Middle	6	439	40.0	49.5	25.9
Upper	7	359	46.7	40.5	37.5
Unknown	0	0	0.0	0.0	0.0
Total	15	887	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	9	130	17.0	10.6	31.7
Moderate	9	203	17.0	16.6	15.9
Middle	16	333	30.2	27.2	17.4
Upper	19	557	35.8	45.5	35.0
Unknown	0	0	0.0	0.0	0.0
Total	53	1,223	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	13	121	21.7	17.8	31.7
Moderate	17	142	28.3	20.9	15.9
Middle	12	92	20.0	13.5	17.4
Upper	15	298	25.0	43.9	35.0
Unknown	3	26	5.0	3.8	0.0
Total	60	679	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	3	33.3	37.5	31.7
Moderate	1	2	33.3	25.0	15.9
Middle	0	0	0.0	0.0	17.4
Upper	1	3	33.3	37.5	35.0
Unknown	0	0	0.0	0.0	0.0
Total	3	8	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	23	254	17.6	9.1	NA
Moderate	29	436	22.1	15.6	NA
Middle	34	864	26.0	30.9	NA
Upper	42	1,217	32.1	43.5	NA
Unknown	3	26	2.3	0.9	NA
Total	131	2,797	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Borrower Edgemont Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	1	30	6.7	3.8	18.4
Moderate	9	499	60.0	63.6	19.2
Middle	4	225	26.7	28.7	23.9
Upper	1	30	6.7	3.8	38.4
Unknown	0	0	0.0	0.0	0.0
Total	15	784	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	7	53	16.7	6.3	27.6
Moderate	14	312	33.3	37.1	14.1
Middle	5	111	11.9	13.2	19.2
Upper	16	364	38.1	43.3	39.1
Unknown	0	0	0.0	0.0	0.0
Total	42	840	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	10	154	17.9	19.3	27.6
Moderate	16	117	28.6	14.6	14.1
Middle	14	193	25.0	24.1	19.2
Upper	14	297	25.0	37.1	39.1
Unknown	2	39	3.6	4.9	0.0
Total	56	800	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	5	64	12.8	12.7	27.6
Moderate	5	66	12.8	13.1	14.1
Middle	9	67	23.1	13.3	19.2
Upper	6	197	15.4	39.0	39.1
Unknown	14	111	35.9	22.0	0.0
Total	39	505	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	23	301	15.1	10.3	NA
Moderate	44	994	28.9	33.9	NA
Middle	32	596	21.1	20.3	NA
Upper	37	888	24.3	30.3	NA
Unknown	16	150	10.5	5.1	NA
Total	152	2,929	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Edgemont Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	15	887	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	15	887	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	53	1,223	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	53	1,223	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	60	679	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	60	679	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	3	8	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	3	8	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	131	2,797	100.0	100.0	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	131	2,797	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2017 Consumer Loan Distribution by Income Level of Geography					
Edgemont Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	15	784	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	15	784	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	42	840	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	42	840	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	56	800	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	56	800	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	39	505	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Total	39	505	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	0	0	0.0	0.0	NA
Middle	152	2,929	100.0	100.0	NA
Upper	0	0	0.0	0.0	NA
Unknown	0	0	0.0	0.0	NA
Total	152	2,929	100.0	100.0	0.0
2017 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Borrower Sioux Falls MSA Assessment Area					
Borrower Income Level	Home Equity Loans				% of Families
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	17.8
Moderate	0	0	0.0	0.0	17.6
Middle	2	59	15.4	3.8	25.9
Upper	10	1,106	76.9	71.4	38.7
Unknown	1	383	7.7	24.7	0.0
Total	13	1,548	100.0	100.0	100.0
Borrower Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	57	703	11.5	6.6	21.1
Moderate	110	1,898	22.2	17.8	17.5
Middle	110	2,131	22.2	20.0	20.1
Upper	218	5,923	44.0	55.6	41.4
Unknown	0	0	0.0	0.0	0.0
Total	495	10,655	100.0	100.0	100.0
Borrower Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	1	5	2.9	0.7	21.1
Moderate	7	132	20.0	19.0	17.5
Middle	6	77	17.1	11.1	20.1
Upper	21	482	60.0	69.3	41.4
Unknown	0	0	0.0	0.0	0.0
Total	35	696	100.0	100.0	100.0
Borrower Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	21.1
Moderate	0	0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	20.1
Upper	2	90	100.0	100.0	41.4
Unknown	0	0	0.0	0.0	0.0
Total	2	90	100.0	100.0	100.0
Borrower Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	58	708	10.6	5.5	NA
Moderate	117	2,030	21.5	15.6	NA
Middle	118	2,267	21.7	17.5	NA
Upper	251	7,601	46.1	58.5	NA
Unknown	1	383	0.2	2.9	NA
Total	545	12,989	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					

2016 Consumer Loan Distribution by Income Level of Geography Sioux Falls MSA Assessment Area					
Census Tract Income Level	Home Equity				% of Owner Occupied Units
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	20.7
Middle	3	99	23.1	6.4	51.9
Upper	10	1,449	76.9	93.6	27.5
Unknown	0	0	0.0	0.0	0.0
Total	13	1,548	100.0	100.0	100.0
Census Tract Income Level	Motor Vehicle Loans				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	77	1,368	15.6	12.8	29.8
Middle	249	5,077	50.3	47.6	47.4
Upper	169	4,210	34.1	39.5	22.8
Unknown	0	0	0.0	0.0	0.0
Total	495	10,655	100.0	100.0	100.0
Census Tract Income Level	Other Secured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	9	121	25.7	17.4	29.8
Middle	19	416	54.3	59.8	47.4
Upper	7	159	20.0	22.8	22.8
Unknown	0	0	0.0	0.0	0.0
Total	35	696	100.0	100.0	100.0
Census Tract Income Level	Other Unsecured				% of Households
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	29.8
Middle	1	30	50.0	33.3	47.4
Upper	1	60	50.0	66.7	22.8
Unknown	0	0	0.0	0.0	0.0
Total	2	90	100.0	100.0	100.0
Census Tract Income Level	Total				NA
	#	\$(000)	# %	\$ %	
Low	0	0	0.0	0.0	NA
Moderate	86	1,489	15.8	11.5	NA
Middle	272	5,622	49.9	43.3	NA
Upper	187	5,878	34.3	45.3	NA
Unknown	0	0	0.0	0.0	NA
Total	545	12,989	100.0	100.0	0.0
2016 FFIEC Census Data and 2015 ACS Data					