



**PUBLIC DISCLOSURE**

April 22, 2024

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First National Bank of Gillette  
Charter Number 15158

319 South Gillette Avenue  
Gillette, WY 82716

Office of the Comptroller of the Currency

Seattle Office  
101 Stewart Street, Suite 1010  
Seattle, WA 98101

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated Outstanding.

**The lending test is rated:** Outstanding.

**The community development test is rated:** Outstanding.

The major factors that support this rating include:

- The Lending Test and Community Development (CD) Test ratings are based on performance within the state of Wyoming.
- A substantial majority of loans were originated within the assessment area (AA), by both number and dollar amount.
- First National Bank of Gillette (FNBG, or bank) exhibits excellent distribution of home mortgage loans to individuals of different income levels and business loans to businesses of different sizes. The bank exhibits reasonable geographic distribution of loans in the state of Wyoming.
- The bank's CD lending performance demonstrates excellent responsiveness to meeting the credit and community service needs in the AA.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.

## Loan-to-Deposit Ratio

Considering First National Bank of Gillette's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable. The bank's average LTD ratio for the three years ended December 31, 2023, is 21.8 percent. We compared FNBG's average LTD ratio with five similarly situated banks, with sizes and footprints that are comparable to FNBG's profile. They had an average LTD ratio of 50.2 percent for the same period. During the same period, FNBG had a highest quarterly LTD ratio of 30.8 percent, and a lowest of 17.5 percent. In comparison, the peer banks had a high of 64.9 percent, and a low of 25.9 percent for the same period. While FNBG has a lower LTD than their peers, there are a few mitigants. The bank originates many loans which are sold on the secondary market. Because these loans are no longer reported on the bank's balance sheet, they are not included in the LTD ratio. Additionally, the bank holds significant public funds that are not used to fund loans, which negatively impacts the bank's LTD ratio. Controlling for these factors results in an LTD of 29.7 percent for the fourth quarter of 2023.

## Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area (AA).

The bank originated and purchased 81.1 percent of its total loans inside the bank's AAs during the evaluation period. By dollar amount, 76.3 percent of loans were made to benefit individuals and businesses located within the bank's AA. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The number of loans and aggregate dollar volume of loans originated meets the standard for outstanding performance.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	500	84.8	90	15.3	590	109,087,257	82.0	23,980,133	18.0	133,067,390
Small Business	434	77.4	127	22.6	561	64,382,583	68.3	29,954,507	31.8	94,337,089
<b>Total</b>	934	81.1	217	18.9	1,151	173,469,840	76.3	53,934,640	23.7	227,404,479
<i>Source: Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

First National Bank of Gillette (FNBG) is a full-service, single-state community bank located in northeastern Wyoming. The bank was founded in 1963 and is headquartered within the city of Gillette, Wyoming. FNBG is a subsidiary of First National Bank of Gillette Holding Company, which is also headquartered in Gillette. FNBG is affiliated with Converse County Bank in Douglas, Wyoming. There was no merger or acquisition activity by FNBG during the evaluation period.

FNBG has three operating branches all within Gillette. Each branch offers similar products and services and has similar weekday hours of operations from 9:00 a.m. to 5:00 p.m. The branch located at 2400 South Douglas Highway is also open on Saturdays from 8:00 a.m. to 12:00 p.m. The bank operates three automated teller machines (ATMs), with one at each branch location. There were no changes to branch locations during the evaluation period. Additional services include online banking.

Each branch offers similar products and services, including retail and commercial deposit and loan products. The bank's suite of deposit products includes checking accounts, savings accounts, and certificates of deposit. The bank has two primary lending products, home mortgage loans and business loans. Lending products offered to individuals include fixed and variable rate home mortgage loans, personal loans, home equity lines of credit, and land construction loans. Business loan types include commercial real estate, multifamily, commercial and industrial, and construction and land development loans. FNBG also offers agricultural loan products. In response to the pandemic, in 2021, FNBG offered Small Business Administration (SBA) Paycheck Protection Program (PPP) loans to small businesses.

As of December 31, 2023, FNBG reported total assets of \$596.1 million, total deposits of \$543.1 million, and tier one capital of \$84.4 million. Net loans and leases were \$125.3 million, or 23.1 percent of total deposits.

There are no financial or legal impediments which restrict FNBG's ability to meet the credit needs of its AA. The bank received a rating of Outstanding at the prior Community Reinvestment Act (CRA) examination conducted by the Office of the Comptroller of the Currency as of April 12, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The bank's performance was evaluated using the Intermediate Small Bank (ISB) Examination Procedures due to its asset size. These procedures include both a lending test and CD test. The lending

test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The objective of this test is to evaluate whether FNBG originated and purchased a reasonable volume of loans to benefit small businesses and home mortgages made to individuals located in low- and moderate- income (LMI) areas. The CD Test evaluates the bank's record of responding to CD needs in its AA through CD lending, qualified investments, donations, and services. The objective of this test is to assess the reasonableness of the bank's participation in CD activity and reasonableness of the bank's volume of CD activity in the bank's AA for the evaluation period.

We determined FNBG's primary loan products were small business loans and home mortgage loans based on the bank's loan portfolio composition and lending activity by product type during the evaluation period. Please refer to the table below for details on the loan portfolio's composition.

<b>Loan Portfolio Composition as of December 31, 2023</b>		
Loan Type	Amount (\$000)	% Of Loan Portfolio
Business Loans	79,996	62.8
Farmland/Agriculture	11,699	9.2
Home Loans	15,815	12.4
Consumer	7,109	5.6
Construction and Development	11,963	9.4
Other	886	0.7
<b>Total</b>	<b>127,468</b>	<b>100.0</b>

*Source: December 31, 2023, Call Report. Due to rounding, totals may not equal 100.0*

The performance evaluation covers small business loans and home mortgage loans originated or purchased between January 1, 2021, through December 31, 2023. Consumer and agricultural lending were not evaluated as the volume for these products did not meet the required level for evaluation. The evaluation period for CD loans, investments, and services is January 1, 2021, through December 31, 2023.

FNBG is not required to report mortgage lending data under the Home Mortgage Disclosure Act (HMDA). We utilized bank-provided aggregated data for home mortgages and small business loans. Prior to utilizing the aggregated totals, we sampled the loan data for each primary product for loans originated during the evaluation period to test for accuracy.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank's overall rating is solely based on the Wyoming state rating, as it is the only rating area for the bank. The bank only has one AA, Campbell County, so the Wyoming rating is also based on the full-scope review of activities within Campbell County.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Wyoming

**CRA rating for the State of Wyoming:** Outstanding

**The Lending Test is rated:** Outstanding.

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes. The bank exhibits reasonable geographic distribution of loans in the state.
- The bank's CD lending performance demonstrates excellent responsiveness to meeting the credit and community service needs in the AA.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.

### Description of Institution's Operations in Wyoming

#### Campbell County

The Campbell County AA consists of the entirety of Campbell County, Wyoming. This includes the city of Gillette, and the surrounding area. Gillette is the county seat of Campbell County and is the largest population center in the region. Most of the region is characterized by small towns and rural areas. The county is in northeast Wyoming, and is bordered by Crook County (northeast), Weston County (southeast), Converse County (south), Johnson County (southwest), and Sheridan County (west). Campbell County is bordered to the north by Montana.

All of the bank's branches are located within this assessment area. The bank has three branches, all located in Gillette, Wyoming. Gillette is the economic and population hub for the area. The population of the area is 47,026 residents, with 33,264 residents living within Gillette. As of 2023, there are ten census tracts (CTs) in the AA. These CTs include one designated as moderate-income, seven as middle-income, and two as upper-income CTs. There are no low-income CTs in the AA.

The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2023, states that nine financial institutions held a total of \$1.4 billion in deposits within the AA. Competition is split between national, regional, and community banks. The largest competitors are First Interstate Bank, Wells Fargo Bank, N.A., and Pinnacle Bank, with a total combined market share of 41.6 percent. FNBG has the largest deposit market share in the AA at 38.7 percent. There are 12 branches between these nine banks within the AA.

#### Housing

The Federal Financial Institutions Examination Council (FFIEC) Median Family Income (MFI) report indicated the MFI for non-MSA portions of Wyoming was \$81,346 in 2020 and grew to \$94,600 in 2023. Data collected in the 2020 U.S Census estimates that 33.9 percent of families within the AA have

income levels that are low- and moderate-income, and 10.4 percent of families in the AA are below poverty line. Specifically, 20.2 percent of the families living in the AA are low-income, 13.7 percent are moderate-income, 23.3 percent are middle-income, and 42.8 percent are upper-income.

Overall, housing values have continued to rise in recent years. There are 20,339 housing units in Campbell County. The median home value, based on the 2020 U.S Census and 2023 D&B Data, is \$219,765. The cost of housing relative to income levels affects low- and moderate-income families' ability to purchase homes in the AA. Home prices are generally lower and more affordable in this AA; however, some low-income families still struggle to afford homeownership. For example, an affordable payment for a low-income family is up to \$1,017 per month (based on income at 50 percent of the median); this is based on an industry-standard measure of home affordability, which equates to 30 percent of income as affordable. A standard 30-year mortgage payment based on the median housing value of \$219,765 would be \$1,537 per month, and this assumes no down payment, a 7.5 percent interest rate, and excludes real estate taxes, insurance, and other homeowner expenses. This generally helps illustrate the potential expense of home ownership.

Additionally, looking at the changes from 2021 to the 2022-2023 period, median home values appreciated 5.4 percent and median income increased 11.7 percent. Within the full evaluation period, the median income has increased and outpaced the level of housing appreciation. This could indicate that housing within the AA has become slightly more affordable within the period. However, housing remains difficult to purchase for LMI borrowers. In 2021, the median house value was 2.9 times the median family income. For prospective LMI borrowers, this ratio rises to at least 5.7 times for low-income individuals, and at least 3.6 times for moderate-income individuals. In the 2022-2023 period, the median house value was 2.7 times the median family income. For prospective LMI borrowers, this ratio rises to at least 5.4 times for low-income individuals, and at least 3.4 times for moderate-income individuals.

### Economy and Employment

The primary industry in Campbell County is energy. The Wyoming Department of Administration and Information's fourth quarter of 2023 Economic Summary report, states that Wyoming's economy continues to grow despite the slowdown in energy businesses' drilling activities. The unemployment rate was 2.3 percent as of December 31, 2023, in Campbell County, or 2.8 percent in the state, which continues to decline and is lower than the national average of 3.7 percent. Home prices continue to increase despite high interest rates, primarily due to low inventories.

### Community Contact

We conducted one community contact interview for the Campbell County AA in conjunction with this evaluation. Our contact noted a few key factors of the economy and stated that it has remained fairly stable overall. Unemployment is low in the surrounding communities and across the state. Small businesses are having difficulty finding employees, with competitive wages being a large factor. Coal mines are a significant driver of the economy in Campbell County; therefore, many individuals work in coal mines as they offer above average pay. Our contact also stated there is a housing shortage. There is the need for new housing construction but cost of materials is also very high. Housing is increasingly becoming unaffordable per the contact, not just for low- and moderate- income individuals but also for middle-income individuals. The contact indicated that local institutions are very involved in their community. The contact noted that a potential opportunity for local financial institutions is to host financial literacy courses for small businesses and market present financial literacy courses to better prepare small businesses for the requirements necessary to obtain business funding.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2021 Campbell County WY</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	7	0.0	0.0	42.9	57.1	0.0
Population by Geography	48,013	0.0	0.0	38.0	62.0	0.0
Housing Units by Geography	19,525	0.0	0.0	40.6	59.4	0.0
Owner-Occupied Units by Geography	12,651	0.0	0.0	38.2	61.8	0.0
Occupied Rental Units by Geography	4,859	0.0	0.0	42.8	57.2	0.0
Vacant Units by Geography	2,015	0.0	0.0	49.8	50.2	0.0
Businesses by Geography	3,447	0.0	0.0	45.7	54.3	0.0
Farms by Geography	140	0.0	0.0	46.4	53.6	0.0
Family Distribution by Income Level	12,193	15.0	12.7	21.1	51.2	0.0
Household Distribution by Income Level	17,510	14.4	12.2	17.1	56.4	0.0
Median Family Income Non-MSAs - WY		\$72,833	Median Housing Value			\$208,428
			Median Gross Rent			\$952
			Families Below Poverty Level			5.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022-2023 Campbell County WY</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	10	0.0	10.0	70.0	20.0	0.0
Population by Geography	47,026	0.0	10.8	62.0	27.2	0.0
Housing Units by Geography	20,339	0.0	10.3	66.8	22.9	0.0
Owner-Occupied Units by Geography	13,056	0.0	9.1	64.1	26.8	0.0
Occupied Rental Units by Geography	4,450	0.0	15.8	66.8	17.3	0.0
Vacant Units by Geography	2,833	0.0	6.8	79.4	13.8	0.0
Businesses by Geography	5,337	0.0	11.5	67.2	21.3	0.0
Farms by Geography	201	0.0	3.5	74.6	21.9	0.0
Family Distribution by Income Level	12,599	20.2	13.7	23.3	42.8	0.0
Household Distribution by Income Level	17,506	22.1	10.3	15.8	51.7	0.0
Median Family Income Non-MSAs - WY		\$81,346	Median Housing Value			\$219,765
			Median Gross Rent			\$882
			Families Below Poverty Level			10.4%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## **Scope of Evaluation in Wyoming**

Ratings in the state of Wyoming are based on the bank's performance in its only AA, Campbell County. As such, we selected Campbell County for a full-scope review as the county represents the majority of FNBG's deposits, commercial and home mortgage lending, and CD activity. Refer to appendix A for the list of AAs under review. The evaluation period is separated between 2021 and 2022-2023 to reflect census data changes.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING**

### **LENDING TEST**

The bank's performance under the Lending Test in Wyoming is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of Wyoming is excellent. FNBG exhibits excellent responsiveness to the credit needs of the AA.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in the state.

We only evaluated the geographic distribution of loans during 2022-2023 as there were no LMI CTs in the AA in 2021. Due to census changes in 2022, the AA had one moderate-income CT in 2022-2023.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the Campbell County AA is reasonable. There were no low-income census tracts in the AA. During 2022-2023, the proportion of bank home mortgage loans in moderate-income census tracts exceeded the percentage of owner-occupied housing and was somewhat below the aggregate industry distribution of loans to that geography.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Wyoming section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small business loans in the Campbell County AA is reasonable. The proportion of bank small business loans to the moderate-income geography was below the percentage of businesses and the aggregate industry distribution of loans to that geography.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels within the Campbell County AA is excellent. When determining our conclusion for borrower distribution of home mortgages, we considered that home mortgage financing may be unaffordable to LMI borrowers. Therefore, we gave more weight in our conclusion to the bank's performance as compared to its peers.

During 2021, the proportion of bank home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution to those families. During 2022-2023, the proportion of bank home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of mortgage loans to those borrowers. The proportion of bank home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution to those families.

### ***Small Loans to Businesses***

Refer to Table R in the state of Wyoming section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans reflects excellent penetration among businesses of different sizes, including small business.

During 2021, the proportion of the bank's small business loans to businesses with revenues less than \$1 million exceeded the percentage of businesses and aggregate industry distribution of loans to those businesses. During 2022-2023, the proportion of bank loans to businesses with revenues less than \$1 million was proximate to the percentage of businesses and exceeded the aggregate industry distribution of loans to those businesses.

## **Responses to Complaints**

There were no consumer complaints related to the bank's CRA performance during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Wyoming is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
	<b>Total</b>			
<b>Assessment Area</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>
<b>Campbell County</b>	6	2%	\$4,130	12%
<b>PPP Loans</b>				
<i>Campbell County AA</i>	234	90%	\$26,977	82%
<i>Broader WY Statewide Area including AA</i>	19	7%	\$1,944	6%
<b>Total</b>	<b>259</b>	<b>100%</b>	<b>\$33,051</b>	<b>100%</b>
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>				

The bank's CD lending performance demonstrates excellent responsiveness to meeting the credit and community service needs in the AA. During the evaluation period, the bank originated a total of 259 CD loans totaling \$33.1 million, in the state of Wyoming. This includes \$4.1 million in CD loans and \$28.9 million in PPP loans. FNBG participated in the second round of the PPP and originated 234 loans totaling \$27 million in the Campbell County AA and 19 loans totaling \$1.9 million in broader Wyoming. The COVID-19 global pandemic led to significant business, supply chain, and income disruption and impacted countries world-wide. To combat the disruption, the SBA authorized and guaranteed loans through the PPP. Examples of other CD loans included loans to fund affordable housing, as well as to fund small businesses which helped promote economic development and support jobs for LMI individuals. Overall, PPP activity coupled with the bank's normal community development lending supports the bank's excellent responsiveness to community development needs, which provided important benefits and needed assistance to the local communities in which the bank operates. Additional CD lending in the broader statewide had a positive impact on the CD lending conclusion.

Examples of CD qualifying loans made during the evaluation period:

- \$1.9 million loan to fund affordable housing in a moderate-income census tract.
- \$1523 thousand SBA 504 loan to promote economic development by financing a small business.
- \$1 million loan to fund the opening of a small business in a moderate-income census tract.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	*Prior Period		Current Period		Total				**Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Campbell County</b>	0	0	59	136	59	100	136	100	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank's CD investment performance demonstrates adequate responsiveness to community development needs in the Campbell County AA. The bank donated \$136 thousand to local organizations that supported community service and economic development in the AA during the evaluation period. These donations helped fund necessary organizations and services, including, but not limited to, food banks, community development organizations, and economic development organizations. There were no prior period investments, and no unfunded commitments.

### Extent to Which the Bank Provides Community Development Services

The bank's performance in providing CD services in Wyoming is adequate. During the evaluation period, FNBG employees dedicated a total of 1,027 service hours to 11 qualified organizations operating in the Campbell County AA. These organizations provide community services, such as food assistance, housing, financial education, and economic development.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2021, to December 31, 2023	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Wyoming</b>		
Campbell County	Full scope	Entire county of Campbell

## Appendix B: Summary of MMSA and State Ratings

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RATINGS First National Bank of Gillette			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Gillette	Outstanding	Outstanding	Outstanding
MMSA or State:			
State of Wyoming	Outstanding	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.



**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area 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 or counties 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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Campbell County WY	210	47,092	100.0	1,422	0.0	0.0	0.0	9.1	9.5	12.3	64.1	59.5	54.4	26.8	31.0	33.3	0.0	0.0	0.0
<b>Total</b>	<b>210</b>	<b>47,092</b>	<b>100.0</b>	<b>1,422</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.1</b>	<b>9.5</b>	<b>12.3</b>	<b>64.1</b>	<b>59.5</b>	<b>54.4</b>	<b>26.8</b>	<b>31.0</b>	<b>33.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Campbell County WY	290	61,995	100.0	2,590	15.0	8.6	5.6	12.7	22.1	14.8	21.1	28.6	20.6	51.2	40.7	18.9	0.0	0.0	40.1
<b>Total</b>	<b>290</b>	<b>61,995</b>	<b>100.0</b>	<b>2,590</b>	<b>15.0</b>	<b>8.6</b>	<b>5.6</b>	<b>12.7</b>	<b>22.1</b>	<b>14.8</b>	<b>21.1</b>	<b>28.6</b>	<b>20.6</b>	<b>51.2</b>	<b>40.7</b>	<b>18.9</b>	<b>0.0</b>	<b>0.0</b>	<b>40.1</b>

*Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022-23</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Campbell County WY	210	47,092	100.0	1,422	20.2	11.0	6.0	13.7	25.7	18.4	23.3	23.3	21.0	42.8	40.0	20.1	0.0	0.0	34.4	
<b>Total</b>	<b>210</b>	<b>47,092</b>	<b>100.0</b>	<b>1,422</b>	<b>20.2</b>	<b>11.0</b>	<b>6.0</b>	<b>13.7</b>	<b>25.7</b>	<b>18.4</b>	<b>23.3</b>	<b>23.3</b>	<b>21.0</b>	<b>42.8</b>	<b>40.0</b>	<b>20.1</b>	<b>0.0</b>	<b>0.0</b>	<b>34.4</b>	

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2022-23</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Campbell County WY	305	48,313	100.0	934	0.0	0.0	0.0	11.5	5.6	9.5	67.2	72.1	69.5	21.3	22.3	21.0	0.0	0.0	0.0	
<b>Total</b>	<b>305</b>	<b>48,313</b>	<b>100.0</b>	<b>934</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.5</b>	<b>5.6</b>	<b>9.5</b>	<b>67.2</b>	<b>72.1</b>	<b>69.5</b>	<b>21.3</b>	<b>22.3</b>	<b>21.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Campbell County WY	129	16,069	100.0	766	78.2	78.3	43.7	6.5	21.7	15.4	0.0
<b>Total</b>	<b>129</b>	<b>16,069</b>	<b>100.0</b>	<b>766</b>	<b>78.2</b>	<b>78.3</b>	<b>43.7</b>	<b>6.5</b>	<b>21.7</b>	<b>15.4</b>	<b>0.0</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Campbell County WY	305	48,313	100.0	934	85.5	73.1	41.6	4.1	26.9	10.4	0.0
<b>Total</b>	<b>305</b>	<b>48,313</b>	<b>100.0</b>	<b>934</b>	<b>85.5</b>	<b>73.1</b>	<b>41.6</b>	<b>4.1</b>	<b>26.9</b>	<b>10.4</b>	<b>0.0</b>

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.