



## **PUBLIC DISCLOSURE**

August 22, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Summit National Bank  
Charter Number: 18154

133 Main Street  
Hulett, WY 82720

Office of the Comptroller of the Currency

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

All ratings are based entirely on the bank’s performance in the states of Wyoming, Montana, and Idaho. The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of Summit National Bank’s loans are inside its assessment areas (AAs).
- Lending activity reflects excellent dispersion among businesses and farms of different sizes in all AAs.
- The bank’s optional community development (CD) activities during the evaluation period reflect favorably on the institution’s responsiveness to community development needs, especially in light of the economic disruptions caused by the COVID-19 pandemic.

### Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA(s), the bank’s loan-to-deposit ratio is reasonable.

Summit National Bank's (SNB) average quarterly LTD was 68.1 percent during the period from March 31, 2017, to December 31, 2021. This is in line with the average LTD ratio of similarly situated institutions, which is 69.1 percent. During this period, SNB's quarterly LTD ranged from a low of 48.9 percent to a high of 85.4 percent. Average peer LTD's ranged from a low of 48.3 percent to a high of 94.8 percent. The peer analysis included 15 banks with assets between \$54 million to \$149 million that operate in Montana, Wyoming, and Idaho.

Summit National Bank		Similar Institutions	
Average LTD Ratio	68.1	Average LTD Ratio	69.1
High LTD Ratio	85.4	High LTD Ratio	94.8
Low LTD Ratio	48.9	Low LTD Ratio	48.3

*Source: FDIC Call Report Data.*

### Lending in Assessment Area

A majority of the bank’s loans are originated inside its AAs.

The bank originated and purchased 72.2 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This data is based upon a sample of 162 loans totaling \$12.8 million across the primary products of agriculture and business loans. Out of 162 loans sampled, 117 loans totaling \$7.3 million were originated within the AAs. This represents 72.2 percent of the sample by number and 57.4 percent by total dollar volume. This meets the standard for satisfactory performance.

**Table D - Lending Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
<b>Small Business</b>	<b>59</b>	<b>75.6</b>	<b>19</b>	<b>24.4</b>	<b>78</b>	<b>3,350</b>	<b>60.1</b>	<b>2,224</b>	<b>39.9</b>	<b>5,574</b>
<b>Small Farm</b>	<b>58</b>	<b>69.1</b>	<b>26</b>	<b>30.9</b>	<b>84</b>	<b>3,974</b>	<b>55.3</b>	<b>3,209</b>	<b>44.7</b>	<b>7,183</b>
<b>Total</b>	117	72.2	45	27.8	162	7,324	57.4	5,433	42.6	12,756

Source: Sampling of Bank Loan Data  
Due to rounding, totals may not equal 100.0%

## Description of Institution

Summit National Bank is a \$98 million federally chartered bank headquartered in Hulett, Wyoming, and operates in limited areas of Montana, Wyoming, and Idaho. SNB was established as Hulett National Bank in 1984. In 2005, Hulett National Bank became known as Summit National Bank and began marketing all branches under this name. In 2009, SNB acquired First National Bank of Ekalaka, located in Ekalaka, MT. In 2011, the bank converted a loan production office in Salmon, Idaho into a full-service branch. The Bank closed two branches in Wyoming, in Baggs and Ten Sleep, during 2015. The institution's primary owner is Hulett Bancorp, a bank holding company also based in Hulett.

SNB operates the main banking location in Hulett, two other branches, and an operations center. In Montana, the branch is located in Ekalaka, with an operations center in Laurel. The Idaho branch is located in Salmon. Products and services offered at the branches are similar. The hours of operations vary slightly between the branches with hours consistent between the Hulett and Ekalaka branches with the lobbies open from 9 a.m. to 3 p.m. The Salmon branch's lobby is open from 9 a.m. to 4 p.m. Monday through Thursday, and until 5 p.m. on Friday. All SNB locations have 24-hour Automated Teller Machines (ATMs), including one deposit taking ATM in Hulett, WY. SNB offers traditional community bank products and services. As of December 31, 2021, net loans represented 48.9 percent of total deposits, and 43.61 percent of total assets. Tier one capital totaled \$9.3 million.

SNB's business focus is providing a variety of credit and deposit services to support the needs of agricultural producers, small businesses, and consumers located within the AAs. The bank maintains three Community Reinvestment Act (CRA) assessment areas with one each in Wyoming, Montana, and Idaho. The AAs are designated counties and are all contiguous. All census tracts (CTs) are designated as distressed or underserved given the remote and rural nature of the bank's service areas. The AAs are discussed in greater detail in the "Description of the Institution's Operations" sections of this Performance Evaluation.

The bank has the financial capacity to assist in meeting the credit needs of its AAs. There are no legal, financial, or other factors that impede SNB's CRA efforts. The Bank received an "Outstanding" rating at the last CRA evaluation dated May 30, 2017.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated SNB under the Small Bank procedures, which assesses the bank's CRA performance under the lending test. The lending test evaluates SNB's record of meeting the credit needs of its AAs through its lending activities. Under the small bank regulatory framework, the bank is not required to conduct CD activities. However, SNB did contribute qualifying lending activity in all AAs and bank management elected to submit these activities for additional CRA consideration. CD activity consisted of loans originated under the Small Business Administration's (SBA) Paycheck Protection Program (PPP) program. However, in the Wyoming AA, these loans were considered under the lending test due to lower overall lending activity during the evaluation period and in order to maintain an acceptable sample size, which included 100 percent of loan originations.

Our assessment included an evaluation of the bank's farm and business loans. The evaluation period for this review is January 1, 2019, to December 31, 2021. During the review period, SNB originated 192 farm loans totaling \$13.9 million and representing 28.4 percent of lending activity by number of loans. During the same period, SNB originated 172 business loans totaling \$10.3 million and representing 25.5 percent of activity by number of loans. During the evaluation period, SNB originated 95 loans totaling \$23.5 million in lease financing receivables to city, state, and county municipalities. Excluding local and regional government lease financing activity, related farm loans account for 38.8 percent of activity by dollar volume while business loans account for 28.6 percent by dollar volume. When added together, business and farm loans, excluding lease financing, equate to 67.5 percent of the overall lending activity by dollar volume during the evaluation period. Therefore, we selected farm and business loans to be evaluated as the bank's primary products in all three AAs for the review period.

<b>Lending Activity 2019 - 2021</b>				
	<b>Dollar</b>	<b>Number</b>	<b>% of \$ Amount</b>	<b>% of # of Loans</b>
Lease Financing Receivables	\$ 23,565,309	95	39.61%	14.07%
Farm Loans	\$ 13,963,366	192	23.47%	28.44%
Business Loans	\$ 10,277,102	172	17.28%	25.48%
1-4 Family Res Construction	\$ 3,109,126	18	5.23%	2.67%
Other Construction & Land Dev	\$ 360,729	18	0.61%	2.67%
Open End Revolving 1-4 Family Res	\$ 1,191,992	10	2.00%	1.48%
Closed end loans 1-4 Fam (1st liens)	\$ 4,509,876	31	7.58%	4.59%
Closed end loans 1-4 Fam (Junior liens)	\$ 56,117	2	0.09%	0.30%
Individual CC	\$ 35,000	1	0.06%	0.15%
Retail auto	\$ 1,746,355	93	2.94%	13.78%
Other Consumer	\$ 612,672	42	1.03%	6.22%
State or Political obligations	\$ 59,420	1	0.10%	0.15%
<b>Total</b>	<b>\$ 59,487,064</b>	<b>675</b>	<b>100.00%</b>	<b>100.00%</b>

## **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 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 a blend of the state ratings. All three of the bank’s AAs were given equal weight during this evaluation. Favorable consideration was given to the bank’s CD lending activities during the evaluation period. The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state 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 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<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The excellent distribution of business and farm loans of different income levels.

### Description of Institution's Operations in Wyoming

SNB operates one branch located in Hulett, Wyoming, located in Crook County. The bank has designated the Wyoming AA as consisting solely of Crook County in its entirety. Crook County is the northeastern most county in Wyoming and shares a border with Carter County, Montana, also an AA of the bank. Crook County is comprised of two middle-income census tracts both designated as underserved due to the rural nature of the tract. One of the census tracts is part of the Black Hills National Forest, which comprises 50 percent or more of the tract. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income (LMI) geographies.

The Wyoming economy has recent improvement in the energy sector, which has begun to benefit the state despite the macro-economic environment being significantly impacted from the supply chain issues caused by the COVID-19 pandemic. However, local economies in the region continue to see some business disruption due to worker shortages. This has largely been caused by an inflated housing market from rising real estate prices and now low inventory despite increasing mortgage rates. Supply chain disruptions caused by the pandemic led to inflated construction costs, which negatively impacted the rate of new construction both on the consumer and commercial economies. Supply chain constraints expanded to all aspects of the economy including commercial and agriculture as this caused increases in freight and other logistics related expenses.

In conjunction with our evaluation, we contacted a community organization knowledgeable about local economic conditions. According to the contact, the local population is largely elderly. Local housing saw significant demand during the pandemic, which has led to low supply and elevated housing prices. This increase in housing prices and limited inventory has begun to impact local businesses that are struggling to find and attract workers as there is little availability of affordable housing, causing some businesses to alter working hours. Affordable housing will remain the largest need for the local community and presents the most opportunity for local financial institutions to get involved with supporting community credit needs.

According to the U.S. 2015 Census data, the Wyoming AA population was 7,229. The median family income is \$72,833. A breakdown of family income levels shows that approximately 14.8 percent of families are low-income, 26.7 percent are moderate-income, 22.4 percent are middle-income, and 36.1

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

percent are upper-income. Approximately 3.1 percent of all households have income levels that fall below the poverty level.

Top employers in Crook County include Neiman Sawmill, Crook County School Districts, Wyoming State Highway Department, and Powder River Energy. Crook County's economy is largely dependent on agriculture, services, energy, and tourism.

Based on FDIC deposit market share data as of June 30, 2021, three financial institutions have a presence in the AA, with three banking locations in Crook County. The report indicates that SNB's deposits in the AA total \$27.9 million with 9.8 percent of the deposit market share. The two other competitors in the AA, Sundance State Bank, and Pinnacle Bank, have 74.1 percent and 16.1 percent of the deposit market share, respectively.

## Wyoming AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wyoming AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	7,229	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,587	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,317	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	641	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	629	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	499	0.0	0.0	100.0	0.0	0.0
Farms by Geography	99	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,153	14.8	26.7	22.4	36.1	0.0
Household Distribution by Income Level	2,958	16.5	19.8	22.8	40.9	0.0
Median Family Income Non-MSAs - WY		\$72,833	Median Housing Value			\$201,425
			Median Gross Rent			\$758
			Families Below Poverty Level			3.1%
<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>						

## Scope of Evaluation in Wyoming

SNB has only one AA in the state of Wyoming, which is comprised solely of Crook County. We performed a full-scope review of business and agriculture lending in the Wyoming AA.

## 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 performance in the Wyoming AA is excellent. SNB exhibits excellent responsiveness to the credit needs of the Wyoming AA by providing loans to farms and businesses of different income levels. We placed equal weight on lending to both small farms and businesses given the bank's volume of lending activities.

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

Because the AA has only middle-income census tracts, geographic analysis is not meaningful. We did note that both tracts within the Wyoming AA are designated as underserved.

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

The bank exhibits an excellent distribution of loans to businesses and farms of different sizes, given the product lines being offered. This exceeds the standard for satisfactory performance. This assessment is based on SNB's evaluation period lending activity compared to aggregate demographic data. For this test, demographic data depicts the size of the businesses and farms of different income thresholds. Bank data was derived from our loan sample and is measured in both dollars and number of loans.

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

The distribution of business loans in the Wyoming AA loan sample reflects excellent penetration among businesses of different sizes. By number, the percentage of loans that benefitted small businesses, which is defined as businesses with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 94.4 percent of the business loans were to small businesses. This exceeded the aggregate comparator of 49.3 percent, along with the percentage of businesses within in the AA that are considered small at 78.0 percent.

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.

#### ***Small Loans to Farms***

The distribution of farm loans in the Wyoming AA loan sample reflects excellent penetration among farms of different sizes. By number, the percentage of loans that benefitted small farms, which is defined as farms with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 100 percent of the farm loans were to small farms. This exceeded the aggregate comparator of 25.0 percent, along with the percentage of farms in the AA that are considered small at 99.0 percent.

Refer to Table T 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 farms.

**Responses to Complaints**

The bank did not receive any CRA-related complaints in Wyoming during the evaluation period.

## State Rating

### State of Montana

**CRA rating for the State of Montana<sup>2</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The excellent distribution of business and farm loans of different income levels.
- The bank demonstrated excellent responsiveness to the community development needs of the Montana AA through participation in the PPP program.

### Description of Institution's Operations in Montana

SNB operates one branch located in Ekalaka, the county seat of Carter County, Montana. Carter County is the southeastern most county in Montana and shares a border with Crook County, Wyoming, also an AA of the bank. Carter County is comprised of one middle-income census tract which is designated as distressed and underserved as a result of population loss, and the rural nature of the geography. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

Data compiled by Moody's Analytics indicates that Montana's economy is in a state of recovery as of March 2022. Major economic drivers include agriculture, tourism, and energy resources. The state benefits from year-round tourist attractions, strong and improving migration trends, and its status as a relatively low-cost place to do business. However, Montana is geographically distant to major markets, has below-average incomes, and the agricultural sector is exposed to volatile weather and commodity price fluctuations. Growth seen during the pandemic due to significant housing market activity is expected to normalize in the near term and farms stand to benefit from rising commodity prices. In the long term, strong population growth is expected to benefit the state, but will exacerbate housing affordability issues.

According to 2015 U.S. Census data, the Montana AA's population was 1,227. The median family income is \$59,777. A breakdown of family income levels shows that approximately 19.9 percent of families are low-income, 16.2 percent are moderate-income, 21.9 percent are middle-income, and 42.0 percent are upper-income. Approximately 7.1 percent of all households have income levels that fall below the poverty level. Top employers in Carter County include Carter County, SE Electric, Dahl Memorial Hospital, and the local school district. Carter County's economy is largely dependent on agriculture, services, and tourism.

Based on FDIC deposit market share data as of June 30, 2021, SNB operates the only branch in the county, and therefore maintained 100 percent of the deposit market share in Carter County, with deposits totaling \$29.4 million.

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

## Montana AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Montana AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1	0.0	0.0	100.0	0.0	0.0
Population by Geography	1,227	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	796	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	428	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	76	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	292	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	122	0.0	0.0	100.0	0.0	0.0
Farms by Geography	83	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	352	19.9	16.2	21.9	42.0	0.0
Household Distribution by Income Level	504	25.4	17.1	16.5	41.1	0.0
Median Family Income Non-MSAs - MT		\$59,777	Median Housing Value			\$87,500
			Median Gross Rent			\$450
			Families Below Poverty Level			7.1%
<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>						

## Scope of Evaluation in Montana

SNB has only one AA in the state of Montana, which is comprised of solely of Carter County. We performed a full-scope review of business and agriculture lending in the Montana AA.

## LENDING TEST

The bank’s performance under the Lending Test in Montana is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Montana AA is excellent. SNB exhibits excellent responsiveness to the credit needs of the Montana AA by providing loans to farms of different income levels and reasonable responsiveness by providing loans to businesses of different income levels. Greater weight was placed on farm lending given the geography of the AA as well as the volume of farm lending during the evaluation period being greater.

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

Because the AA has only one middle-income census tract, geographic analysis is not meaningful. We did note that the tract within the Montana AA is designated as distressed and underserved.

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

The bank exhibits an excellent distribution of loans given the product lines being offered. The bank exhibited excellent distribution to farms of different sizes and reasonable penetration amongst businesses of different sizes, however we place greater emphasis on the distribution to farms of different sizes as the bank's lending data shows more farm lending activity during the evaluation period. During the review period, the agricultural lending accounted for over 38 percent of overall activity compared to over 28 percent for small business lending. The local geography of Carter County in Montana is dominated by agriculture as well and has limited commercial opportunities compared to larger metropolitan areas. This exceeds the standard for satisfactory performance. This assessment is based on SNB's evaluation period lending activity compared to aggregate demographic data. For this test, demographic data depicts the size of the businesses and farms of different income thresholds. Bank data was derived from our loan sample and is measured in both dollars and number of loans.

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

The distribution of business loans in the Montana AA loan sample reflects reasonable penetration among businesses of different sizes. By number, the percentage of loans that benefitted small businesses, which is defined as businesses with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 80.0 percent of the business loans were to small businesses, which exceeded the aggregate comparator of 35.0 percent. While this percentage fell slightly below the percentage of businesses within the AA that are considered small at 86.1 percent, in light of the comparator performance, the overall performance is reasonable.

Refer to Table R in the state of Montana 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.

### ***Small Loans to Farms***

The distribution of farm loans in the Montana AA loan sample reflects excellent penetration among farms of different sizes. By number, the percentage of loans that benefitted small farms, which is defined as farms with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 100 percent of the farm loans were to small farms. This exceeded the aggregate comparator of 76.7 percent and was in line with the percentage of farms in the AA that are considered small at 100 percent.

Refer to Table T in the state of Montana 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 farms.

## **Responses to Complaints**

The bank did not receive any CRA-related complaints in Montana during the evaluation period.

## COMMUNITY DEVELOPMENT

Based on full-scope review, the bank exhibits excellent responsiveness to community development needs in the state of Montana through community development loans, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a positive effect on the bank's rating in the state.

### Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Montana	27	100	330	100

The bank's performance related to community development lending in Montana is excellent and includes consideration for lending under the SBA's PPP. During the evaluation period, the COVID-19 global pandemic impacted global economies including the bank's assessment areas and led to significant business, supply chain, and income disruption. In order to combat the disruption, the SBA authorized and guaranteed loans through the PPP. SNB participated in this program and originated 27 loans totaling \$330 thousand in the Montana AA which assisted in keeping small businesses in operation while avoiding layoffs in the local communities that the bank operates in.

## State Rating

### State of Idaho

**CRA rating for the State of Idaho<sup>3</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The excellent distribution of business and farm loans of different income levels.
- The bank demonstrated excellent responsiveness to the community development needs of the Idaho AA through participation in the PPP program.

### Description of Institution's Operations in Idaho

SNB operates one branch located in Salmon, ID within Lemhi County. Lemhi County is in the central-eastern part of Idaho and is surrounded by three national forests (NF): Bitterroot NF, Beaverhead-Deerlodge NF, and the Salmon-Challis NF. The Idaho AA is comprised of three middle-income census tracts, all of which are designated as underserved due to the rural nature of the tracts. The three middle-income census tracts comprise the entirety of Lemhi County. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

Data compiled by Moody's Analytics indicates that Idaho's economy is in period of late expansion as of February 2022. Major economic drivers include agriculture, and high tech industries. However, Idaho has an abundance of low-wage service jobs, highly cyclical tech industries that contribute to above-average volatility, and well below-average labor productivity. In the near term, demand for healthcare services is projected to lead to job gains that exceed the national average, but manufacturing will be a weak spot until supply-chain issues ease and inflation decreases. Single family home price corrections are possible and could impact the economy.

According to the 2015 U.S. Census data, the Idaho AA's population was 7,790. The 2015 median family income is \$52,867. A breakdown of family income levels shows that approximately 25.4 percent of families are low-income, 15.5 percent are moderate-income, 22.2 percent are middle-income, and 37.0 percent are upper-income. Approximately 9.1 percent of all households have income levels that fall below the poverty level. The census data also shows that the median house value is \$176 thousand and the median gross rent is \$536. However, this data does not reflect migration influx due to the COVID-19 pandemic which has led to reduced housing supply, causing significant growth in home and rental housing prices that have had significant impacts on the local communities.

Top employers in Lemhi County include the U.S. Forest Service, Bureau of Land Management, U.S. Fish & Wildlife Service, and the Steele Memorial Hospital. Lemhi County's economy is largely dependent on agriculture, government, mining and timber production, services, and tourism.

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<sup>3</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

In conjunction with our evaluation, we contacted a community organization knowledgeable about local economic conditions. According to the contact, the local economy has been impacted from the effects of the COVID-19 pandemic. Initially, businesses were able to stay open during the pandemic and were doing well. As housing prices rose due to an influx of new residents, rental prices increased, leading to a decline in housing supply and in turn, housing affordability. Housing affordability has begun to impact consumers; some businesses are having difficulty maintaining normal operations due to staffing challenges because of the limited supply of housing for prospective staff. The largest opportunity for financial institutions is centered in products and services geared toward alleviating the housing issue through financing new developments to ease supply constraints and thus reducing pricing barriers.

Based on FDIC deposit market share data as of June 30, 2021, four financial institutions have a presence in the AA, with four banking locations in Lemhi County. The report indicates that SNB's deposits in the AA total \$20.1 million with 13.4 percent of the deposit market share. The three other competitors are U.S. Bank, N.A. with 40.9 percent, Wells Fargo Bank, N.A. with 37.8 percent, and Washington Federal Bank with 7.9 percent. However, in conversation with bank management it was noted that in the fourth quarter of 2021, Washington Federal closed the Salmon, ID branch which leaves three financial institutions operating in the AA.

## Idaho AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Idaho AA</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)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	7,790	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,740	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,645	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,076	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,019	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,022	0.0	0.0	100.0	0.0	0.0
Farms by Geography	98	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,176	25.4	15.5	22.2	37.0	0.0
Household Distribution by Income Level	3,721	29.0	21.5	15.4	34.1	0.0
Median Family Income Non-MSAs - ID		\$52,867	Median Housing Value			\$176,466
			Median Gross Rent			\$536
			Families Below Poverty Level			9.1%
<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>						



## **Scope of Evaluation in Idaho**

SNB has only one AA in the state of Idaho, which is comprised of solely of Lemhi County. We performed a full-scope review of business and agriculture lending in the Idaho AA.

## **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Idaho AA is excellent. SNB exhibits excellent responsiveness to the credit needs of the Idaho AA by providing loans to farms and businesses of different income levels. We placed equal weight on lending to both small farms and businesses given the bank's performance.

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

Because the AA has only middle-income census tracts, geographic analysis is not meaningful. All three tracts within the Idaho AA are designated as underserved.

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

The bank exhibits an excellent distribution of loans to businesses and farms of different sizes, given the product lines being offered. This exceeds the standard for satisfactory performance. This assessment is based on SNB's evaluation period lending activity compared to aggregate demographic data. For this test, demographic data depicts the size of the businesses and farms of different income thresholds. Bank data was derived from our loan sample and is measured in both dollars and number of loans.

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

The distribution of business loans in the Idaho AA loan sample reflects excellent penetration among businesses of different sizes. By number, the percentage of loans that benefitted small businesses, which is defined as businesses with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 90.5 percent of the business loans were to small businesses, which exceeded the aggregate comparator of 46.5 percent, along with the percentage of businesses within in the AA that are considered small at 88.1 percent.

Refer to Table R in the state of Idaho 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.

### ***Small Loans to Farms***

The distribution of farm loans in the Idaho AA loan sample reflects excellent penetration among farms of different sizes. By number, the percentage of loans that benefitted small farms, which is defined as farms with gross annual revenues of \$1 million or less, exceeds the demographic and aggregate comparators. Within our sample, 100 percent of the farm loans were to small farms. This exceeded the

aggregate comparator of 72.0 percent, along with the percentage of farms in the AA that are considered small at 98.0 percent.

Refer to Table T in the state of Idaho 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 farms.

**Responses to Complaints**

The bank did not receive any CRA-related complaints in Idaho during the evaluation period.

**COMMUNITY DEVELOPMENT**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA. Performance related to community development activities had a positive effect on the bank’s rating in the state.

**Number and Amount of Community Development Loans**

The Community Development Loans Tables, shown below, sets forth the information and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Idaho	38	100	1,625	100

The bank’s performance related to community development lending in Idaho is excellent and includes consideration for lending under the SBA’s PPP. During the evaluation period, the COVID-19 global pandemic impacted global economies including the bank’s assessment areas and led to significant business, supply chain, and income disruption. In order to combat the disruption, the SBA authorized and guaranteed loans through the PPP. SNB participated in this program and originated 38 loans totaling \$1.6 million in the Idaho AA which provided liquidity for businesses and job preservation for workers in the local communities that the bank operates in.

## Appendix A: Scope of Examination

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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 MSAs and non-MSAs 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, 2019 to December 31, 2021	
<b>Bank Products Reviewed:</b>	Small business and small farm Community development loans	
<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>		
Wyoming AA	Full-scope	Crook County
<b>Montana</b>		
Montana AA	Full-scope	Carter County
<b>Idaho</b>		
Idaho AA	Full-scope	Lemhi County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Summit National Bank
Overall Bank:	Lending Test Rating
Summit National Bank	Outstanding
State:	
Wyoming	Outstanding
Montana	Outstanding
Idaho	Outstanding

## 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.
- 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.

**Wyoming AA**

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-21</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	
Wyoming	18	623	100.0	71	78.0	94.4	49.3	5.0	5.6	17.0	0.0	
<b>Total</b>	<b>18</b>	<b>623</b>	<b>100.0</b>	<b>71</b>	<b>78.0</b>	<b>94.4</b>	<b>49.3</b>	<b>5.0</b>	<b>5.6</b>	<b>17.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2019-21</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Wyoming	17	581	100.0	32	99.0	100.0	25.0	0.0	0.0	1.0	0.0	
<b>Total</b>	<b>17</b>	<b>581</b>	<b>100.0</b>	<b>32</b>	<b>99.0</b>	<b>100.0</b>	<b>25.0</b>	<b>0.0</b>	<b>0.0</b>	<b>1.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Montana AA**

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-21</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
Montana	20	925	100.0	20	86.1	80.0	35.0	3.3	20.0	10.7	0.0
<b>Total</b>	<b>20</b>	<b>925</b>	<b>100.0</b>	<b>20</b>	<b>86.1</b>	<b>80.0</b>	<b>35.0</b>	<b>3.3</b>	<b>20.0</b>	<b>10.7</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2019-21</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Montana	20	2,109	100.0	43	100.0	100.0	76.7	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>2,109</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>100.0</b>	<b>76.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Idaho AA**

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-21</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	
Idaho	21	1,802	100.0	215	88.1	90.5	46.5	2.7	9.5	9.2	0.0	
<b>Total</b>	<b>21</b>	<b>1,802</b>	<b>100.0</b>	<b>215</b>	<b>88.1</b>	<b>90.5</b>	<b>46.5</b>	<b>2.7</b>	<b>9.5</b>	<b>9.2</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2019-21</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Idaho	21	1,284	100.0	25	98.0	100.0	72.0	0.0	0.0	2.0	0.0	
<b>Total</b>	<b>21</b>	<b>1,284</b>	<b>100.0</b>	<b>25</b>	<b>98.0</b>	<b>100.0</b>	<b>72.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%