



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

April 06, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Commerce Bank of Wyoming, National Association
Charter Number 24654

601 College Drive
Rock Springs, WY 82901-0000

Office of the Comptroller of the Currency

Omaha Field Office
13710 FNB Parkway, Suite 110
Omaha, NE 68154-5298

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

Commerce Bank of Wyoming, National Association (CBW) meets the credit needs of its assessment area (AA). The primary lending activity is business loans.

- A majority of the bank's loans are within the AAs.
- The bank's lending efforts resulted in satisfactory penetration of businesses of different sizes.
- The bank's average loan-to-deposit (LTD) ratio exceeds that of similarly situated banks in the AA.

SCOPE OF EXAMINATION

Small bank procedures were used to evaluate the bank's performance under the Community Reinvestment Act (CRA). A full scope review was completed of the bank's CRA activities in the AA since January 1, 2007. The primary product for the AA is business loans. A sample of 20 business loans from the bank's AA was reviewed to evaluate the bank's lending performance. The evaluation period for the lending test was January 1, 2007 to February 24, 2009.

DESCRIPTION OF INSTITUTION

CBW is a \$69 million bank headquartered in Rock Springs, Wyoming, in Sweetwater County. CBW opened as a de novo bank May 22, 2006. The bank has one location and one cash dispensing ATM located near the main location. This is the first CRA examination for the bank. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the AA.

CBW offers traditional loan and deposit products. As of December 31, 2008, the bank's loan portfolio consisted of commercial (86%), agricultural (3%), residential real estate (10%), and consumer (1%) loans based on average gross loans. The following table shows the breakdown of loans originated and purchased since January 1, 2007, with the bank's primary product in bold.

Primary Product in Assessment Area (AA)

Loan Type	% by Dollars of Loans Originated/Purchased during evaluation period	% by Number of Loans Originated/Purchased during evaluation period
Home Loans	8.6%	18.3%
Consumer Loans	1.9%	13.6%
Business Loans	86.6%	66.5%
Agricultural Loans	2.9%	1.6%
Total	100%	100%

Source: Bank Reports.

DESCRIPTION OF ASSESSMENT AREA

CBW's AA encompasses all of Sweetwater County. The AA is contiguous and reasonable for the bank. Twelve census tracts comprise Sweetwater County, seven of which are designated as underserved and distressed by the Federal Financial Institutions Examination Council (FFIEC). Seven of the census tracts are designated as middle-income areas and five are designated as upper-income areas. The AA does not arbitrarily exclude any low- or moderate-income areas. There are two other similarly situated financial institutions within the AA.

According to the 2000 U.S. Census, the total population of the AA is 37,613. Approximately 14% of families in the AA are low-income, 14% are moderate-income, 22% are middle-income, and 50% are upper-income. Seven percent of the AA households are below the poverty level. The local economy has seen aggressive growth over the past five years; however, the current condition of the national economy has created a slowdown. The level of unemployment remains relatively low at 3.04%. The largest employers in the AA include mining services, oil and gas production, and local schools.

We conducted one community contact with a local organization. The community contact indicated local banks were meeting the lending needs of the community. In addition, local banks participate in community development projects as opportunities arise.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

CBW's average LTD ratio exceeds that of similarly situated financial institutions in the AA. The bank's LTD ratio averaged 75.45% since it opened and exceeds the AA peer average of 61.49% for the same time period. Peer LTD ratio ranged from a high of 69% and a low of 53.98%.

Lending in Assessment Area

A majority of CBW's loans were made within the bank's AA. We reviewed a sample of 20 business loans made within the AA, originated between January 1, 2007 and February 24, 2009, to determine the bank's lending performance within the AA. We identified 13 loans or 65% of loans were originated within the bank's AA. The following table illustrates the bank's satisfactory performance regarding lending in the AA.

Lending in the Assessment Area										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business	13	65	7	35	20	5,856,985	45	7,204,600	55	13,061,585

Source: Bank Reports.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

CBW meets the standard for performance and reflects reasonable penetration to businesses with gross annual revenues less than \$1 million.

The distribution of loans to businesses reflects reasonable penetration among businesses of different sizes. 60% of the bank’s loans to businesses originated and purchased during the loan sampling period were made to small businesses. This is considered reasonable as the number exceeds demographic data that shows 51.34% of the area’s businesses are considered small business. The following table illustrates the distribution of business loans among businesses of different sizes.

Borrower Distribution of Loans to Businesses in AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	51.34%	3.68%	44.98%	100%
% of Bank Loans in AA by #	60%	40%	0%	100%
% of Bank Loans in AA by \$	67%	33%	0%	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

An analysis of the geographic distribution of loans was not meaningful as the AA did not have any low- or moderate-income geographies.

Responses to Complaints

CBW has not received any CRA related complaints since opening in May 2006.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.”