



PUBLIC DISCLOSURE

January 16, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hilltop National Bank
Charter Number 15359

300 Country Club Road
Casper, Wyoming 82609-0000

Office of the Comptroller of the Currency

1225 17th Street, Suite 450
Denver, Colorado 80202

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 following table indicates the performance level of **Hilltop National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Hilltop National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The distribution of mortgage and small farm loans reflects excellent penetration among borrowers of different income levels. The distribution of loans to businesses reflects good penetration among businesses of different sizes.
- The geographic distribution of small loans to businesses is good. The geographic distribution of small loans to farms is adequate.
- HNB originated a substantial majority of loans by number within the AA.
- The bank has an excellent level of community development (CD) loans within the AA.
- The bank has a satisfactory level of CD investments within the AA.
- The branch distribution system is accessible to all portions of the AA. The bank provides an excellent level of CD services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

Hilltop National Bank (HNB or bank) is an \$849 million (as of December 31, 2016) intrastate financial institution established in 1964 by local investors, headquartered in Casper, Wyoming. In 1977, the H.A. True, Jr. family purchased the institution. The True family has organized several firms (the True Affiliated Companies) that are based in Casper, including Midland Financial Corporation. Midland Financial Corporation wholly owns HNB. While Midland Financial Corporation has several affiliates, it has no other subsidiaries than HNB.

HNB is a full-service banking institution offering a wide range of loan and deposit products for individuals and businesses. The bank's primary lending focus is home mortgage loans and small business loans. HNB sold 47 and 57 percent of the home loans it originated on the secondary market during 2015 and 2016, respectively. In addition, the bank sold 11 percent of home mortgage loans to the Wyoming Community Development Authority each year. The bank's \$248 million loan portfolio is comprised of the following types of loans: 43 percent residential real estate, 32 percent commercial real estate, 11 percent commercial and industrial, 9 percent consumer, 4 percent agricultural, and 1 percent other loans. As of December 31, 2016, deposits totaled \$775 million, with tier 1 capital of \$80.2 million. Net loans represent 29 percent of total assets.

HNB operates its main office and four full-service branch locations in Casper, Wyoming and one full-service branch location in Glenrock, Wyoming, which is 24 miles east of Casper. The bank has ten ATMS, one at each branch location, three located in grocery stores, and one at Natrona County International Airport. The bank's operations are all located in one AA. The AA consists of 19 census tracts (CTs)s, which include no low-income, four moderate-income, ten middle-income, and five upper-income CTs. Two of the bank's branches are located in moderate-income CTs and four are located in middle-income CTs. For the ATMs in the AA, two are located in moderate-income CTs, seven are located in middle-income CTs, and one is located in an upper-income CT.

Other financial institutions provide competition throughout the institution's AA. The bank has the highest deposit market share in the AA at 28.2 percent and is one of ten lenders. Other major competitors include First Interstate Bank, Wells Fargo Bank, The Converse County Bank, and Bank of the West. These four banks comprise 60.3 percent of the total deposit market share.

HNB did not have financial, legal, or other impediments that may have affected their ability to help meet the credit needs of its AA.

The Office of the Comptroller of the Currency rated HNB's CRA performance as "Outstanding" at the bank's last CRA evaluation dated March 3, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is January 1, 2015 to December 31, 2016. Our analysis included home mortgage loans, small loans to businesses, and small loans to farms. Our analysis did not include multi-family loans, as the number of reported loans for this product type is insufficient for meaningful analysis in the AA.

For CD loans, the evaluation period is from January 1, 2015 to January 16, 2018. For the Investment and Service Tests, the evaluation period is from March 4, 2015 through January 16, 2018. The Investment Test included a review of investments and donations originated in HNB's AA that meet the definition of CD investments. The Service Test included a review of retail and CD services provided in HNB's AA that meet the definition of CD services.

Data Integrity

We did not complete a separate data integrity review of the 2015 and 2016 Home Mortgage Disclosure Act (HMDA) reportable loans and the CRA data of small loans to businesses and small farm loans. This data was deemed accurate in the past, there were no material changes to the bank's process in recording this data, and the bank's internal review process found the data to be accurate.

We evaluated CD loan, investment, and service information provided by management to determine eligibility and accuracy during this CRA evaluation. We discussed any CD loans, investments, or services that did not qualify for CD consideration with the bank during the evaluation. A few of the CD loans, services, and investments did not qualify as they were either not adequately supported, did not meet the definition of CD, or were outside of the examination period. The remaining CD loans, investments, and services qualified and were included in this CRA evaluation.

Selection of Areas for Full-Scope Review

HNB has one AA. The AA consists of the entire county of Natrona and one CT (City of Glenrock) in Converse County. We performed a full-scope review of the AA. See Appendix A for the specifics on the scope of the evaluation and AA. See Appendix B for the AA market profile.

Ratings

The bank's overall rating is based entirely on the results from the bank's single AA subject to a full-scope review. The overall rating is a blend of the bank's performance under the Lending, Investment, and Services Tests.

When evaluating the bank's performance under the Lending Test, we weighted the distribution of home mortgage loans, small loans to businesses, and small loans to farms in the AA. We took into consideration the number of loans and dollar volume of loans originated in each loan category in the AA. At this review, we placed equal weight on small business and home

mortgage lending. While small business lending has the largest lending volume by number of loans, home mortgage lending has the highest volume by dollars. Small business loans represent 54 percent by number and 45 percent by dollar volume of total reported loans. Home mortgage lending represents 38 percent by number and 50 percent by dollar volume of total reported loans. Small farm loans represents only 8 and 5 percent by number and dollars of total reported loans.

In our analysis of home mortgage lending, home purchase loans received the most weight since they represent 59 percent of HNB's total home mortgage lending by number. The next highest weight was placed on home mortgage refinance loans, followed by home improvement loans, which represent 31 percent and 10 percent of total home mortgage lending by number, respectively.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 Consumer Financial Protection Bureau, 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Wyoming AA is excellent. The bank's lending activity in the AA demonstrates excellent responsiveness to AA credit needs. The overall geographic distribution of bank lending in the AA is adequate. The bank originated a substantial majority of loans within the AA during the evaluation period. The bank reflects excellent penetration of lending to borrowers with different income levels. The bank's level of CD lending had a significant positive impact on the lending test.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Based on a full scope review, HNB's lending activity in the Wyoming AA shows excellent responsiveness to AA credit needs. Based upon FDIC Deposit Market Share data as of June 30, 2016, HNB achieved a 28.2 percent market share of deposits, ranking first among ten financial institutions in the AA. Based upon 2016 Peer Data by number of loans, HNB achieved a 5.5 percent market share of home purchase loans ranking fifth out of 84 reporting lenders. The top two home purchase lenders realized 42.6 percent of the total market share. For home refinance loans, HNB achieved 5.5 percent market share and ranked fourth out of 114 reporting lenders. The top three home refinance lenders realized 31.3 percent of total market share. For home improvement loans, the bank achieved a 16.7 percent market share and ranked second out of 27 reporting lenders. The top ranked institution realized a 29.6 percent of total market share. For small loans to businesses, HNB was ranked first out of 49 lenders with a 15.0 percent market share. For loans to small farms, HNB is ranked first out of 11 reporting lenders with a 47.3 percent market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of bank lending is adequate. There are no low income tracts within the Wyoming AA. While the overall geographic distribution of home mortgage loans is poor, good performance was evidenced in small loans to businesses and the distribution of small loans to farms is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans is poor as the heaviest weighting was placed on home purchase loans. Our analysis did not include multi-family loans because loan volume is insufficient for meaningful geographical analysis.

Home Purchase

The distribution of HNB's home purchase loans is considered poor due to the percentage of loans originated in moderate-income tracts being well below the percentage of owner occupied units in moderate-income CTs in the AA. Also, the bank's market share of home purchase loans originated in moderate-income CTs is well below the bank's overall market share for home purchase loans.

Home Improvement

The distribution of home improvement loans is good. The portion of HNB's home improvement loans originated in moderate-income CTs is below the demographic comparator but considered adequate. The bank's market share of home improvement loans in moderate-income CTs exceeds its total market share.

Home Refinance

The distribution of home refinance loans is adequate. The percentage of loans originated in moderate-income CTs is well below the demographic comparator. However, the bank's market share of refinance loans originated in moderate income CTs is near to the bank's overall market share for home refinance loans.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

HNB's geographic distribution of small loans to businesses is good. The percentage of loans originated in moderate-income CTs is below the percentage of businesses located in these geographies. However, HNB's market share of small loans to businesses in moderate-income CTs is near to the bank's overall market share and ranks second for all bank in moderate-income CTs in the AA.

Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

HNB's distribution of small loans to farms is adequate. The percentage of loans originated in moderate income CTs is well below the percentage of farms located in these geographies. However, the bank's overall market share of small loans to farms in moderate-income CTs in the AA exceeds its overall market share of small loans to farms in the AA.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed HNB's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

For the evaluation period, HNB originated a substantial majority of all reportable loan products inside the bank's AA. HMDA reportable loans originated within the AA totaled 96 percent (by number). For CRA reportable loans, HNB originated 92 percent of small loans to businesses and 80 percent of small loans to farms inside the AA.

Distribution of Loans by Income Level of the Borrower

The distribution of mortgage and small farm loans reflects excellent penetration among borrowers of different income levels. The distribution of loans to businesses reflects good penetration among businesses of different sizes.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower income distribution of home mortgage loans is excellent. The bank's borrower distribution of home purchase loans reflects excellent penetration of lending to borrowers of different income levels, while lending for home improvement is at an adequate level, and home refinance is at a good level.

The poor level of lending to low-income borrowers noted below is somewhat mitigated by the barriers to making home purchase loans to low-income individuals. Lending opportunities to low-income individuals are few given the cost of housing compared to the low median family income. The bank's market share of low- and moderate-income individuals for home purchase and home refinance lending exceeds the bank's overall market share in those products. In addition, the bank's home improvement market share to low-income individuals exceeds the bank's overall home improvement market share. Also, Casper is considered an energy driven city and energy prices usually impact other economic indicators in the AA. Oil prices bottomed out in late 2015, which had a negative impact on the local economy and the availability of well-paying jobs.

Home Purchase

HNB's borrower distribution of home purchase loans reflects excellent penetration of lending to borrowers with different income levels. While home purchase lending to low-income borrowers is poor and well below the percentage of low-income families in the AA, lending to moderate-income borrowers is excellent and exceeds the percentage of moderate-income families in the AA. HNB's market share to low- and moderate-income borrowers exceeds its total market share for home purchase loans.

Home Improvement

HNB's borrower distribution of home improvement loans reflects adequate penetration of lending to borrowers with different income levels. The portion of home improvement loans to low-income borrowers is poor and well below the percentage of families designated as low-income in the AA. The portion of HNB's home improvement loans to moderate-income borrowers is adequate but below the percentage of moderate-income families in the AA. HNB's market share to low-income borrowers exceeds total market share for home improvement loans. The bank's market share to moderate-income borrowers is well below overall market share for home-improvement loans.

Home Refinance

HNB's borrower distribution for home refinance loans reflects good penetration of lending to borrowers of different incomes. The percentage of home refinance loans to low-income borrowers is poor and well below the percentage of low-income families located in the AA. The percentage of home refinance loans to moderate-income borrowers is excellent and exceeds the percentage of moderate-income families in the AA. HNB's market share for low and moderate-income borrowers exceeds its total market share for home refinance loans.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to businesses is good. The bank's lending to small businesses (*Businesses with revenues of \$1 million or less*) is adequate and below the percentage of small businesses in the AA. The distribution by size of loan shows that a substantial majority of originations are \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million exceeds the bank's small business lending market share in the AA.

Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to farms is excellent. The bank's lending to small farms (*Farms with revenues of \$1 million or less*) is near to the percentage of small farms in the AA. The distribution of size of loan shows that a majority of originations are \$100,000 or less. The bank's lending to farms with revenues less than \$1 million exceeds the bank's small farm lending market share in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The level of CD loans had a significant positive impact on the overall lending test rating. The bank originated one qualified CD loan totaling \$5.5 million during the evaluation period. The loan funds were advanced to an organization that is rehabilitating an existing structure in downtown Casper into low-income housing. This CD loan totaled 6.9 percent of tier one capital. This CD loan is not considered innovative or flexible.

Product Innovation and Flexibility

HNB offers a traditional mix of lending products in the Wyoming AA. We did not consider any bank products or services to be innovative or flexible. Impact on the Lending Test is neutral.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the investment test is rated Low Satisfactory. Refer to Table 14 in appendix C for the facts and data that support these conclusions.

HNB has a satisfactory level of qualified community development investments and grants that went to meet the needs of the Wyoming AA. The bank holds eight qualifying investments totaling \$3.34 million. The bank did not make any new qualifying investments during this review period. The investments include Revenue Bonds issued by the Wyoming Community Development authority, Albany County, Sweetwater County, and Casper College, primarily to finance school projects that benefit LMI students and seniors. None of the investments were considered innovative or complex. In addition, during this rating period the bank made donations totaling \$51,470 to 17 organizations that were responsive to affordable housing, healthcare, job training, and youth services for LMI individuals. Total investments and donations represent a little over 4 percent of the bank's total tier one capital.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

HNB's performance under the service test is rated Outstanding. Based on the full-scope review, the bank's performance in the AA is excellent.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB's branch distribution is accessible to geographies and individuals of different income levels throughout the AA. The bank operates 6 branches and 10 ATMs in the Wyoming AA. There are no low-income geographies in this AA. Two branches are located in moderate-income census tracts and four are located in middle-income census tracts. HNB did not open or close any branches during the exam period. No ATMs were opened, but one ATM (located in a middle-income CT) was closed during the evaluation period. Two ATMs are located in

moderate-income census tracts, seven in middle-income census tracts, and one in an upper-income census tract

HNB's hours and services meet the needs of the community. The bank's office and drive-thru hours do not vary from location to location. Hours of operation change based on the day of the week and remain constant throughout the branches. The bank provides online retail banking services including E-statement, mobile deposit, mobile banking application, and online bill pay. The bank offers a free checking account with no minimum balance requirement. The bank did not collect information to determine how these services impacted low to moderate-income individuals. Therefore, these services did not impact the service test rating for the full-scope AA.

Community Development Services

HNB provides an excellent level of CD services in the AA. Thirty bank employees provided 1,382 hours to 23 different organizations that benefit LMI individuals and promote economic development. Examples of HNB's CD services include:

- Two employees served an organization that provides affordable housing with one on the board as Vice Chair and the other provided planning and implementation of a statewide literacy program.
- Two employees provided grant writing to secure down payment assistance from the Federal Home Loan Bank to facilitate affordable housing in the Wyoming AA.
- One employee served as a committee member of the local Community Action Agency that provides services to low-income individuals by providing rent and mortgage assistance, emergency food, and lodging.
- Two employees served an organization that provides food, shelter, and assistance for homeless individuals and families with one on the board and the other assisted in fundraising efforts.

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 metropolitan and nonmetropolitan areas 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2015 to 12/31/2016) CD Loans: (01/01/2015 to 01/16/2018) Investment and Service Tests: (03/04/2015 to 01/16/2018)	
Financial Institution	Products Reviewed	
Hilltop National Bank (HNB) Casper, Wyoming	Home Mortgage Loans (includes home purchase, home improvement, and home refinance loans) reported on the HMDA-LAR, as well as small loans to businesses and farms as reported on the CRA loan register.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wyoming AA	Full-Scope	Consists of all of Natrona County, Wyoming and one CT in Converse County, Wyoming

Appendix B: Community Profiles for Full-Scope Areas

Wyoming AA

Demographic Information for Full-Scope Area: Wyoming AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	21.05	52.63	26.32	0.00
Population by Geography	78,303	0.00	16.85	56.40	26.75	0.00
Owner-Occupied Housing by Geography	21,573	0.00	15.51	56.94	27.54	0.00
Businesses by Geography	5,696	0.00	28.79	46.77	24.44	0.00
Farms by Geography	181	0.00	16.02	43.65	40.33	0.00
Family Distribution by Income Level	20,545	18.72	19.22	21.07	40.99	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,794	0.00	24.19	58.49	17.32	0.00
Median Family Income	= \$66,362					
HUD Adjusted Median Family Income for 2016	= \$72,395					
Households Below the Poverty Level	= 9%					
				Median Housing Value	= \$173,623	
				Unemployment Rate	= 2.36%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The bank claims only one AA, which includes all CTs in Natrona County and one CT in Converse County. HNB has 5 branches in Casper, Wyoming (Natrona County) and one branch in Glenrock, Wyoming (Converse County). The main branch is located in Casper. The bank operates ten ATMs in the AA, nine are located in the Casper area and one at the branch in Glenrock. There are four moderate-income CTs, ten middle-income CTs, and five upper-income CTs. There are no low-income CTs in the AA. For evaluation purposes, we combined the Glenrock CT with the Casper MSA, as the inclusion of the Glenrock CT does not cause the AA to extend substantially beyond the boundaries of the Casper MSA.

The bank faces moderate competition within its AA. Ten financial institutions operate 23 banking locations in the AA as of June 30, 2016. Major competitors include First Interstate Bank, Wells Fargo Bank, The Converse County Bank, and Bank of the West. HNB is ranked first in the AA with a market share of 28.2 percent.

Per the August 2017 Moody's Analytics report, Casper's recession is moderating, but the economy has yet to turn the corner. Employment in the energy industry is stalling, while population and income losses are weighing on housing demand and consumer industries. There are some bright spots in the economy. Factory output is near pre-bust levels, and manufacturing employment is at a more than one-year high. Construction payrolls are also on an upswing, and the public sector is staging a comeback. Average hourly earnings are rising faster than they are nationally year over year.

Gradually rising oil and gas prices are expected to stimulate more drilling, bringing back some of the lost energy jobs. Greater fossil fuel production will also be a plus for local tax revenues, lifting the ailing public sector. However, job gains in high-wage industries will be modest, limiting the boost to income growth. In addition, without the draw of well-paying jobs, in-migration is expected to slow, resulting in population growth that is much lower than the previous decade's average, a negative for healthcare, consumer services, and housing.

Top employers in the Casper, Wyoming MSA area include Wal-Mart Stores, Wyoming Medical Center, Halliburton, Wyoming Machinery Company, Casper College, and DHS Drilling. Leading employment sectors include education and health services, government, retail trade, and leisure and hospitality services. Leading industries by wage tier include support activities for mining and oil and gas extraction. The Bureau of Labor Statistics reports the December 2016 unemployment rate of Natrona County at 6.8 percent. That is an increase from December 2015 when it totaled 5.8 percent. For Converse County the December, 2016 unemployment rate totaled 5.6 percent, an increase from December 2015 (4.6 percent). Both counties are above the state and national unemployment rates of 5 percent and 4.7 percent, respectively.

We interviewed one community contact servicing this AA during the examination. The contact stated that grant money from banks is needed for every community based organization to help fund their programs. These grant needs include financing for future multi-family affordable housing projects.

Appendix C: Tables of Performance Data

Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: WYOMING						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Wyoming AA	100.00	448	78,545	634	70,043	89	8,379	1	5,527	1,172	162,494	100.00
Statewide:												
Statewide; Not in AA	0	0	0	0	0	0	0	1	2,964	1	2,964	

* Loan Data as of December 3, 2016. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 1, 2015 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: WYOMING								Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Wyoming AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

* Loan Data as of December 31, 2016. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 2015 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: WYOMING		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016	
	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
MA/Assessment Area:					
Full Review:					
Wyoming AA	0	0	0	0	0

*The evaluation period for Optional Product Line(s) is from January 01, 2015 to December 31, 2016.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WYOMING						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Wyoming AA	236	100.00	0.00	0.00	15.51	9.89	56.94	65.40	27.54	24.71	5.53	0.00	3.91	6.00	5.22

* Based on 2016 Peer Mortgage Data: US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

****Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: WYOMING				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]									
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp					
Full Review:																				
Wyoming AA	47	100.00	0.00	0.00	15.51	12.77	56.94	53.19	27.54	34.04	16.67	0.00	18.18	12.16	23.40					

^{*} Based on 2016 Peer Mortgage Data: US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: WYOMING			Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp				
Full Review:																			
Wyoming AA	137	100.00	0.00	0.00	15.51	7.30	56.94	64.23	27.54	28.47	5.52	0.00	5.19	5.84	5.01				

* Based on 2016 Peer Mortgage Data: US and PR

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WYOMING				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
Wyoming AA	1	100.00	0.00	0.00	22.62	100.00	41.49	0.00	35.90	0.00	16.67	0.00	50.00	0.00	0.00

* Based on 2016 Peer Mortgage Data: US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: WYOMING						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wyoming AA	634	100.00	0.00	0.00	28.79	22.87	46.77	44.79	24.44	32.33	14.97	0.00	14.77	15.30	16.70

* Based on 2016 Peer Small Business Data: US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WYOMING						Evaluation Period: JANUARY 1, 2015 to DECEMBER 31, 2016						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wyoming AA	89	100.00	0.00	0.00	16.02	5.62	43.65	3.37	40.33	91.01	47.27	0.00	50.00	28.13	56.52

* Based on 2016 Peer Small Business Data: US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WYOMING							Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Wyoming AA	263	100.00	18.72	12.31	19.22	35.00	21.07	21.54	40.99	31.15	5.53	9.22	7.10	4.18	8.41

* Based on 2016 Peer Mortgage Data: US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.1 % of loans originated and purchased by Bank.

*Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: WYOMING				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016					Market Share [*]				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Wyoming AA	47	100.00	18.72	10.87	19.22	17.39	21.07	32.61	40.99	39.13	16.67	18.18	5.00	25.00	15.38	

^{*} Based on 2016 Peer Mortgage Data: US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 2.1 percent of loans originated and purchased by Bank.

^{*}Data shown includes only One to Four-family and manufactured housing (Property type 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WYOMING						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Wyoming AA	137	100.00	18.72	11.94	19.22	20.15	21.07	26.87	40.99	41.04	5.52	6.82	9.78	6.02	8.26

* Based on 2016 Peer Mortgage Data: US and PR

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by Bank.

* Data shown includes only One to Four-family and manufactured housing (Property type 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: WYOMING		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Wyoming AA	634	100.00	77.51	64.98	72.56	17.19	10.25	14.97	18.94

* Based on 2016 Peer Small Business Data: US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.20% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: WYOMING		Evaluation Period: JANUARY 1, 2015 to DECEMBER 31, 2016			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Wyoming AA	89	100.00	96.69	95.51	66.29	20.22	13.48	47.27	60.49

^{*} Based on 2016 Peer Small Business Data: US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.25% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WYOMING AA				Evaluation Period: MARCH 4, 2015 TO DECEMBER 16, 2018			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wyoming AA	8	\$3,346,307	41	\$51,470	49	\$3,397,777	100.00	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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WYOMING Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
WYOMING AA	100.00	6	100.00	0.00	33.33	67.67	0.00	0	0	0	0	0	0	0.00	16.85	56.40	26.75