



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 17, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hilltop National Bank
Charter Number: 15359

300 Country Club Road
Casper, WY 82609-0000

Office of the Comptroller of the Currency

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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 (HNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
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:

- Hilltop National Bank’s lending levels reflect excellent responsiveness to the credit needs of its assessment area (AA).
- The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is excellent.
- HNB’s distribution of home mortgage loans to borrowers of different income levels is good and to businesses of different sizes is excellent.
- The bank originated/purchased a substantial majority of its loans within its AA.
- HNB provided nearly \$4 million in community development (CD) loans that directly benefited the bank’s AA or the broader statewide area, including the bank’s AA, during the evaluation period. This level of CD lending had a positive impact on the bank’s lending performance.
- HNB demonstrated excellent performance in providing qualified CD investments and donations in its AA. The bank had over \$6 million in qualified CD investments and donations that benefited the AA during the evaluation period.
- Service delivery systems are readily accessible to individuals of different income levels throughout the AA.

- HNB representatives provided a high level of community development services to numerous organizations serving its AA.

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 usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and

dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

Rated Area: A rated area is a state or 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) and the Thrift Financial Reporting (TFR) 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) is a full-service financial institution headquartered in Casper, Wyoming. As of September 30, 2011, HNB had total assets of \$561 million and tier one capital of \$51 million.

HNB is a wholly owned subsidiary of Midland Financial Corp (MFC), which is also headquartered in Casper, Wyoming. HNB is the only subsidiary of MFC.

HNB offers a full range of credit products within its AA including commercial, real estate, and consumer loans. The bank's primary focus is commercial lending to small- and mid-sized businesses and home mortgage lending. The bank operates a mortgage loan department. The vast majority of loans from the mortgage department are intended for sale on the secondary market.

By dollar amount, HNB's loan portfolio consisted of the following types of credits as of September 30, 2011: 42 percent one-to-four family residential; 31 percent other real estate loans; 14 percent consumer and other loans; 12 percent commercial and industrial; and 1 percent agricultural loans.

HNB operates as an intrastate bank with offices located in the state of Wyoming only. As of the start date of this examination, the bank had six offices and 15 automated teller machines (ATMs) in its only AA. HNB has not engaged in any merger and acquisition activity, nor has it opened or closed any branches, since the last CRA examination.

There are no legal, financial, or other impediments that would hamper the bank's ability to help meet the credit needs of its AA. HNB received an "Outstanding" rating under the prior Large Bank CRA Examination performed as of January 7, 2008.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans and CRA loans (small loans to businesses and small loans to farms) is from January 1, 2007 to December 31, 2010. We based market comparisons on 2010 peer mortgage data and 2010 small business and small farm data. The evaluation period for community development loans, investments, and services is January 8, 2008 to January 17, 2012.

We did not include CRA loan data from 2008 and 2009 in our analysis as the bank was unable to provide data in a usable format. We therefore relied on 2007 and 2010 CRA loan data to evaluate the bank's performance in meeting the credit needs of small businesses and small farms.

The CRA regulation also gives consideration to a bank's multi-family loans. We did not include an analysis of this loan product in the summary of the Lending Test because HNB made only one multi-family loan in the AA during the evaluation period. Consequently, the data is not meaningful.

Data Integrity

We tested the accuracy of the bank's publicly reported data for home mortgage loans, small loans to businesses, and small loans to farms during a separate examination. HMDA and CRA loan data for 2009 and 2010 was found to be substantially accurate.

We also reviewed CD loans, investments, and services submitted by HNB to ensure they meet the regulatory definition for community development. This evaluation considers only those loans, investments, and services that meet the definition and purpose of community development.

Selection of Areas for Full-Scope Review

As the bank has only one AA, we performed a full scope review for that AA.

Ratings

The bank's overall rating is based entirely on the results from the AA subject to a full-scope review.

When determining the lending test conclusion, HNB's home mortgage lending was weighted more heavily because the majority of the bank's reportable products were HMDA products. Home mortgage loans represent 60 percent of the total HMDA and CRA loans reported during the evaluation period. Within the bank's HMDA lending, home purchase, home improvement, and home refinance loans are weighted based on volume. Within the bank's CRA lending, small business loans and small farm loans are also weighted based on volume.

We also gave consideration to qualitative factors such as complexity, innovation, responsiveness, and flexible lending programs. CD lending is considered to have a neutral or positive impact on overall Lending Test ratings, based on volume, complexity, or community impact of the transactions.

The Service Test analysis focuses on HNB's distribution of branches by income level of the geography. Changes in branch locations and CD services receive a lesser amount of weight in overall conclusions of the Service Test. However, CD services, if significant, can have a positive impact on the overall Service Test Ratings.

Other

During our review, we interviewed a community contact with a local community development agency. The contact stated pressing needs in the community were home ownership and financial literacy counseling, as well as construction and permanent financing for multi-family housing, including affordable housing.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Area Receiving Full-Scope Review

The bank's performance under the lending test is rated "High Satisfactory." Based on a full-scope review of the bank's AA, HNB's performance is good.

Lending Activity

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

Overall, lending activity is excellent relative to area credit needs and the bank's deposit market share. Over the evaluation period, HNB originated \$187 million in reportable home mortgage loans, \$160 million in small loans to businesses and \$5 million in small loans to farms.

To analyze HNB's lending activity, we compared the bank's deposit market share with its lending market share for home mortgage loans, small loans to businesses, and small loans to farms. In comparing the market share percentages, we took into consideration that deposit market share information includes only deposit-taking financial institutions that had one or more branches located in the AA. In regard to the lending market share, we considered lenders who do not have deposit-taking facilities in HNB's AA but reported one or more home mortgage loans and one or more small loans to businesses in the AAs in 2010.

The level of lending in the bank's AA is excellent. Based on June 30, 2011 FDIC deposit market share data, there were 11 deposit-taking financial institutions with one or more banking offices in the AA. Based on dollar volume of deposits, HNB ranked second with a deposit market share of 22 percent.

Peer small business loan data for 2010 indicates the bank ranked second among 25 lenders that reported small business loans with a market share of 22 percent based on number of loans. Peer small farm loan data for 2010 indicates the bank ranked first among seven lenders that reported small farm loans with a market share of 48 percent based on number of loans.

Peer home mortgage loan data for 2010 indicates the bank's market share is eight percent for home purchase loans, 17 percent for home improvement loans, and 10 percent for home refinance loans. The bank ranks fifth among 26 lenders that reported home purchase loans, second among 21 lenders that reported home improvement loans, and third among 26 lenders that reported home refinance loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, and 4 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 geographic distribution of home mortgage loan products was adequate in the bank's AA. As the AA does not contain any low-income census tracts, the evaluation was based primarily on lending performance in moderate-income geographies. More emphasis was placed on distribution than market share because the market share is only reflective of the most recent data available (i.e. 2010 HMDA peer data).

For home purchase loans, the bank's geographic distribution to moderate-income CTs was good. The distribution in moderate-income CTs was near to the demographic comparator, and the bank's market share in moderate-income CTs substantially met the bank's overall market share.

For home improvement loans, the bank's pattern of lending to moderate-income geographies was adequate in its AA. The distribution in moderate-income CTs was somewhat lower than the demographic, and the bank's market share in moderate-income CTs substantially met the bank's overall market share.

For home refinance loans, the geographic distribution of loans was adequate. The distribution in moderate-income geographies was lower than the demographic, but the market share significantly exceeds the bank's overall market share for these loans in the AA.

The bank did not make a sufficient volume of multifamily loans in its AA to enable a meaningful analysis of geographic distribution of this loan product.

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.

The geographic distribution of small loans to businesses was excellent in the AA. The distribution in moderate-income geographies was near to the demographic comparator, and the bank's market share in the moderate-income CTs significantly exceeded the bank's overall market share.

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 geographic distribution of small loans to farms is adequate. The distribution in moderate-income geographies was lower than the demographic comparator, but the bank's market share in the moderate-income CTs significantly exceeded the bank's overall market share.

Lending Gap Analysis

We reviewed HNB's lending data for HMDA and CRA reportable loan products made in the bank's AA in order to identify conspicuous gaps in the geographic distribution of these loans. After considering the bank's lending volumes, competition in the AA, and demographic factors, we did not identify any conspicuous gaps in lending.

Inside/Outside Ratio

An analysis of HNB's concentration of lending within its AA revealed that a substantial majority of the number of home mortgage loans and small loans to businesses were originated or purchased in the bank's AA. Ninety-four (94) percent of the HMDA loans and 91 percent of the small loans to businesses were originated or purchased in the bank's AA. This positively impacted the overall Lending Test rating. While a smaller majority of small loans to farms, 76 percent, were originated or purchased in the bank's AA, this is mitigated by the relatively limited amount of farm activity in the AA. Additionally, the level of small farm lending is minimal relative to the level of small business and home mortgage lending. As such, small business and home mortgage lending were weighted more heavily when evaluating the inside/outside ratio.

Distribution of Loans by Income Level of the Borrower

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.

Overall, borrower distribution of home mortgage loans was good. Equal weight was placed on lending activity to low-income borrowers and moderate-income borrowers. More emphasis was placed on distribution than market share because the market share is only reflective of the most recent data available (i.e. 2010 HMDA peer data).

For home purchase loans, the bank's pattern of lending to LMI borrowers was adequate in the AA. Among low-income borrowers, distribution was significantly lower than the demographic comparator and market share was below the bank's overall market share. However, among moderate-income borrowers, distribution significantly exceeded the demographic comparator and market share substantially met the bank's overall market share.

For home improvement loans, the bank's distribution to LMI borrowers was good. Among low-income borrowers, distribution was lower than the demographic, but the market share significantly exceeded the bank's overall market share. Among moderate-income borrowers, distribution exceeded the demographic and the market share substantially met the bank's overall market share.

For mortgage refinance loans, the borrower distribution of loans was good. Among low-income borrowers, distribution was lower than the demographic, but the market share significantly exceeded the bank's overall market share. Among moderate-income borrowers, distribution

significantly exceeded the demographic and the market share substantially met the bank's overall market share.

The bank did not make a sufficient volume of multi-family loans in the AA to enable a meaningful analysis of borrower distribution of this loan product.

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 borrower distribution of small loans to businesses was excellent in the AA. The percentage of reported small loans to businesses that were made to businesses with revenues of \$1 million or less was near to the percentage of businesses in the AA that generate revenues of \$1 million or less. The bank's market share of loans made to businesses with revenues of \$1 million or less significantly exceeded its market share of all small loans to businesses.

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 borrower distribution of small loans to farms of different sizes was excellent in the AA. The percentage of reported small loans to farms that were made to farms with revenues of \$1 million or less was near to the percentage of farms in the AA that generate revenues of \$1 million or less. The bank's market share of loans made to farms with revenues of \$1 million or less significantly exceeded its market share of all small loans to farms.

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 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 bank originated two qualified CD loans totaling approximately \$4 million during the evaluation period. The level of CD loans had a positive impact on the overall Lending Test rating.

A loan totaling \$1.5 million was provided to a for-profit developer to construct a Low Income Housing Tax Credit project (LIHTC). By nature LIHTC properties serve families earning 60% or less of the area median income (AMI). Though the project was constructed in Sheridan, Wyoming, which is not part of the bank's AA, it is considered a qualified investment that benefits a broader statewide area (including the bank's AA).

A loan totaling \$2.5 million was provided to construct three group homes on the Northwest Community Action Programs (NOWCAP) campus in Casper, Wyoming. NOWCAP Services is

a subsidiary of Northwest Community Action Programs of Wyoming, a Community Action Program (CAP) agency. The CAP was founded by the 1964 Economic Opportunity Act to assist in combating poverty. Activities are carried out by Community Action Agencies (CAA)s, which are local private and public non-profit organizations. Each CAA is governed by a board of directors consisting of at least one-third low-income community members, one-third public officials, and up to one-third private sector leaders. This board structure is defined by federal statute and is known as a tripartite board.

Product Innovation and Flexibility

The bank did not offer any innovative or flexible loan products during this review period

INVESTMENT TEST

Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Investment Test is rated "Outstanding". Based on our full-scope review, the bank's performance in its AA is excellent.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank originated 61 qualified investments totaling approximately \$5.6 million during this evaluation period and held nine investments totaling \$555 thousand from the prior period. Total qualified investments, including those originated in the prior period, represent over 12 percent of tier one capital.

We considered investment opportunities in the AA as well as the broader statewide area and determined opportunities to be limited. This is due to the relatively sparse population of the AA and limited investment issuances at the state level.

HNB's level of investments represents excellent performance based on their responsiveness to credit needs of low- and moderate-income individuals and the relatively limited opportunities within the AA. Investments consist of revenue bonds used to finance affordable housing, critical infrastructure, and educational projects that benefit LMI individuals. In addition, HNB made qualified donations to 24 community development organizations providing services and affordable housing to LMI individuals or promoting economic development within the AA.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Service Test is rated "Outstanding." Based on our full-scope review, the bank's performance in its 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. Branch distribution received the most weight in rating the bank's performance under the service test.

Service delivery systems are readily accessible to geographies and individuals of different income levels in HNB's AA. This is based on the excellent distribution within the AA. As there are no low-income CTs within the AA, accessibility within moderate-income CTs was given the most weight. The percentage of branches in moderate-income CTs is significantly above the percentage of the population that lives in these geographies.

The bank did not close or open any branches in moderate-income CTs during this review period, though one ATM located in a moderate-income CT was closed. This ATM was located in a medical center and was closed at their request. One branch located in a moderate-income CT was relocated during this review period, though it was relocated a short distance from the previous location and remains in the same moderate-income CT.

HNB's ATM network offers a reasonable alternative system for delivering retail banking services to LMI individuals. In the AA, 27 percent of the ATMs are located in moderate-income CTs, which exceeds the portion of the population living in moderate-income CTs.

Banking hours and services do not vary significantly among the different branches. They are tailored to meet the needs of each community. All branches offer full-service banking during regular business hours. Lobby and drive-up hours for branches located in moderate-income geographies are substantially similar to those offered in other geographies. Most branches offer extended weekday and weekend hours. Full-service banking is offered during regular business hours at all locations.

Community Development Services

HNB representatives provided a high level of community development services to numerous organizations serving the bank's AA. Bank associates, including executive management, provided 2,604 hours of service to 30 qualified organizations during the evaluation period. These representatives provided technical assistance to entities that support small business owners and economic development in areas including moderate-income geographies, entities that support affordable housing in the AA, and organizations that provide assistance to LMI. Bank representatives often served in leadership roles, including membership on Boards of Directors and officer positions. The level of CD services had a positive impact on the overall Service Test rating.

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): 01/01/07 to 12/31/10 Investment and Service Tests and CD Loans: 01/08/08 to 01/17/12	
Financial Institution	Products Reviewed	
Hilltop National Bank(HNB) Casper, Wyoming	-- Home mortgage loans, including home purchase, home improvement, and home refinance. -- Small loans to businesses. -- Small loans to farms -- Community development loans. -- Community development investments. -- Community development services. -- Retail bank services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Casper AA	Full-Scope	Consists of all of Natrona County, WY and one CT in adjacent Converse County, WY

Appendix B: Market Profiles for Full-Scope Areas

Casper AA

Demographic Information for Full Scope Area: Casper AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0.00	22.22	61.11	16.67	0.00
Population by Geography	69,025	0.00	19.56	58.53	21.91	0.00
Owner-Occupied Housing by Geography	19,498	0.00	17.42	60.94	21.63	0.00
Business by Geography	6,787	0.00	34.74	49.11	16.15	0.00
Farms by Geography	177	0.00	20.34	63.28	16.38	0.00
Family Distribution by Income Level	18,507	19.32	19.06	23.35	38.28	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	7,102	0.00	27.81	58.31	13.88	0.00
Median Family Income		45,456	Median Housing Value		82,624	
HUD Adjusted Median Family Income for 2010		65,738	Unemployment Rate as of 11/30/11		5.6%	
Households Below Poverty Level		11%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2010 HUD updated MFI.

HNB designated all of Natrona County plus one CT in adjacent Converse County as an assessment area, collectively the Casper AA. Natrona County consists of the Casper WY MSA, while the adjacent CT consists of the town of Glenrock, WY. For evaluation purposes, the Glenrock CT was combined with the Casper WY MSA as the inclusion of the Glenrock CT does not cause the AA to extend substantially beyond the boundaries of the Casper WY MSA. The combined AA consists of 18 census tracts; 4 are moderate-income, 11 are middle-income, and 3 are upper-income. No low-income census tracts are contained in the AA.

HNB operates its main office, 5 branches, and 15 ATMs within the AA, where competition among financial institutions was moderate. Eleven deposit-taking financial institutions operated 25 banking offices in HNB's AA as of June 30, 2011. Major competitors included First Interstate Bank, Wells Fargo Bank, Converse County Bank, and Bank of the West. First Interstate Bank and HNB have the largest presence in the market with 26 and 22 percent of deposits, respectively.

The local economy, while not immune from the national economic downturn that occurred during the evaluation period, has been fairly resilient due to continued strength in the energy extraction industry. While the local unemployment rate crested at 8.8 percent in January 2010, it has trended steadily downward since and has been aided by increased opportunity for domestic energy exploration. Due to the availability of area employment opportunities in the energy sector, area population has increased by roughly 13 percent since 2000. This has increased demand for housing across all income demographics and has pushed housing

prices higher. This, in turn, has caused affordable housing to remain a primary community need within the AA.

We interviewed a community contact serving this AA during the examination. The contact stated pressing needs in the community were home ownership and financial literacy counseling, as well as construction and permanent financing for multi-family housing, including affordable housing.

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 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, 2007 TO DECEMBER 31, 2010												
Assessment Area (2010):	% 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:												
Casper AA	100.00	1,401	187,239	868	159,767	73	5,118	2	0	2,342	352,124	0.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: WYOMING				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010									
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:															
Casper AA	634	100.00	0.00	0.00	17.42	16.09	60.94	61.04	21.63	22.87	7.97	0.00	7.87	7.28	10.13

* Based on 2010 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 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, 2007 TO DECEMBER 31, 2010									
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Casper AA	189	100.00	0.00	0.00	17.42	13.23	60.94	66.67	21.63	20.11	16.75	0.00	14.29	18.70	12.77

* Based on 2010 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 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, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans					
Full Review:															
Casper AA	577	100.00	0.00	0.00	17.42	10.57	60.94	62.91	21.63	26.52	10.12	0.00	12.20	10.04	9.44

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 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: HOME MORTGAGE REFINANCE		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Casper AA	577	100.00	0.00	0.00	17.42	10.57	60.94	62.91	21.63	26.52	10.12	0.00	12.20	10.04	9.44	

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010				
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:																								
Casper AA	866	100.00	0.00	0.00	34.74	32.22	49.11	55.20	16.15	12.59	22.10	0.00	24.87	26.51	21.05									

* Based on 2010 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 (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: WYOMING															
Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010															
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:															
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57

* Based on 2010 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57	

* Based on 2010 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 (2010).

Table 9. Borrower Distribution of Home Improvement Loans

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57	

* Based on 2010 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 (2010).

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57	

* Based on 2010 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 (2010).

Table 11. Borrower Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57	

* Based on 2010 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 (2010).

Table 12. Borrower Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WYOMING					Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Casper AA	72	100.00	0.00	0.00	20.34	11.11	63.28	84.72	16.38	4.17	48.28	0.00	60.00	54.84	28.57	

* Based on 2010 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 (2010).

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WYOMING		Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Casper AA	9	555	61	5,646	0	01	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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, 2007 TO DECEMBER 31, 2010																	
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:																	
Casper AA	100.00	6	100.00	0.00	0.00	66.66	0.00	0	0	0	0	0	0	0.00	19.56	58.53	21.91