



## **PUBLIC DISCLOSURE**

March 31, 2016

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

The First National Bank of Santa Fe  
Charter Number 1750

2101 Mountain Road, NW, Suite A  
Albuquerque, NM 87104

Office of the Comptroller of the Currency

Denver Field Office  
1225 17th Street, Suite 450  
Denver, CO 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

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

The following table indicates the performance level of The First National Bank of Santa Fe (FNBSF) with respect to the Lending, Investment, and Service Tests:

Performance Levels	The First National Bank of Santa Fe Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
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:

- A substantial majority of FNBSF's volume of lending is made in the bank's Assessment Areas (AAs).
- FNBSF's community development (CD) lending in the states of New Mexico and Colorado had a positive impact on the states' Lending Test rating. FNBSF has made a relatively high level of community development loans in both New Mexico and Colorado.
- FNBSF's branches are accessible to geographies and individuals of all income levels. The bank provides a relatively high level of CD services.
- FNBSF has a significant volume of qualified investments in relation to the investment opportunities and identified needs in the bank's AAs.
- Borrower distribution for small business lending is adequate in the Albuquerque AA and poor for the Santa Fe AA. Borrower distribution for small business lending in the Denver AA is adequate. Geographic distribution for small business loans is excellent in the Albuquerque AA

and poor in the Santa Fe AA. Geographical distribution for small business lending in the Denver AA is good.

- Geographic distribution for HMDA loans in the Albuquerque AA is adequate and poor in the Santa Fe AA. Borrower distribution for HMDA loans in the Albuquerque AA and the Santa Fe AA is poor.

## 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 (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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 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 (MSA):** 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

FNBSF, chartered in 1870, was the first bank in the Southwest, and is currently headquartered in Albuquerque, New Mexico. In 2012, FNBSF merged with the Bank of the Rio Grande, NA, headquartered in Las Cruces, New Mexico and Mile High Banks, headquartered in Longmont, Colorado. Since the merger of charters in 2013, FNBSF has been a wholly owned subsidiary of First National Bancorp (FNBC), headquartered in Albuquerque, New Mexico. FNBC is a wholly owned subsidiary of Strategic Growth Bancorp (SGBC) located in El Paso, Texas. SGBC also owns Capital Bank located in El Paso, Texas and Guardian Mortgage Company located in Dallas, Texas. As of December 31, 2015, FNBSF had total assets of \$1.8 billion, net loans of \$975 thousand, and tier one capital of \$178 million.

FNBSF is an interstate bank with operations in New Mexico and Colorado. During the CRA evaluation period, the bank had 14 physical branches in New Mexico and 14 physical branches in Colorado prior to the closing or selling of several in Colorado. The bank sold the Limon, Colorado branch in 2016. The bank also closed six branches in the Denver MSA, two in September 2013, one in December of 2013 and three in December of 2015. Several of the assessment areas are included in LMI income census tracts. Within New Mexico there are two branches in moderate-income census tracts and six branches within ½ mile of an LMI census tract. In Colorado there are three branches within a moderate-income census tract and four branches within ½ mile of an LMI neighborhood. In addition to the full service branches, FNBSF has one mobile office, which presently provides service to one retirement community in Santa Fe, New Mexico, which is in a middle-income census tract. The mobile branch could potentially provide alternative delivery services in Santa Fe, Los Alamos, Rio Arriba, Taos, San Miguel, and Sandoval Counties.

FNBSF originates a significant volume of both commercial and residential real estate loans within their loan portfolio. The composition of the loan portfolio includes 57 percent commercial real estate loans, 19 percent residential real estate loans, 8 percent construction and development loans, 12 percent commercial loans, and 3 percent individual loans.

FNBSF's largest deposit market share is in Santa Fe, at 51 percent. Denver has the second highest level at 15 percent. The markets in Denver and Santa Fe are very competitive. FNBSF is one of 11 FDIC insured institutions in the Santa Fe MSA and controls 21.30 percent of the deposit market share. Five institutions within this MSA control over 85 percent of the deposit market share. Two of these institutions are branches of large national banks, one is a state chartered bank, and the other is an independent community bank operating solely in New Mexico. In addition, FNBSF is one of 145 FDIC insured institutions in the Denver MSA and controls 0.36 percent of that deposit market share.

FNBSF's lending markets remain very competitive. In the Albuquerque AA FNBSF is one of 204 HMDA reporting lenders and has a 0.62 percent market share of reported home purchase mortgage loans. FNBSF has a 2.87 percent market share of reported small business loans and is one of 66 lenders in the AA. In the Santa Fe MSA FNBSF is one of 176 HMDA reporting lenders and has 2.10 percent market share of reported home purchase mortgage loans. FNBSF has a 13.45 percent market share of reported small business loans and is one of 48 lenders in the MSA. In the Denver MSA FNBSF is one of 620 HMDA reporting lenders and has a 0.01 percent market share of reported home purchase mortgage loans. FNBSF has a 0.63 percent market share of reported small business loans and is one of 149 lenders in the MSA. FNBSF market share in the other AAs for HMDA and CRA reported data is considered consistent or lower than the Albuquerque, Santa Fe, and Denver markets.

FNBSF previously received a CRA rating of “Satisfactory” on December 10, 2012 under the Large Bank criteria. The bank was rated “Low Satisfactory” on each of its three tests – Lending, Investment, and Service.

There are no legal, financial, or other factors impeding the bank’s ability to meet the credit needs in its assessment area. However, it is noted that the bank has spent a considerable amount of time in 2014 and 2015 addressing asset quality and management issues that resulted from the mergers that occurred just prior to this CRA evaluation period.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses information since the previous examination dated December 10, 2012. FNBSF is evaluated as a Large Bank for CRA purposes. The evaluation period for our review of FNBSF's CD loans, investments, and services, as well as retail banking services, covers the period from March 31, 2013 to March 31, 2016. The evaluation period for our review of FNBSF's home mortgage and small business loan originations (HMDA and CRA data) covers January 1, 2014 to December 31, 2015. Mortgage loans reviewed were home purchase, home improvement, and home refinance loans. Multi-family loans were not a primary product and were not evaluated. Small farms loans were not a primary product and were not evaluated. Given the merger with the three other banks, we excluded 2013 loan data from our analysis.

### Data Integrity

We determined the accuracy of the data used for the evaluation through a series of data integrity tests. Our CRA Data Integrity examination found 2014 and 2015 HMDA data and 2015 CRA data to be reliable. We did not identify any significant errors during these reporting periods. However, our review of the 2014 small business and small farm CRA data identified significant errors greater than 5 percent in the key field of "revenue". Bank management reviewed and corrected the 2014 CRA data. We confirmed the reliability of the data during our second review. The data used in this evaluation is accurate.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Generally, we chose full-scope areas because they represented a significant portion of the bank's deposit base and lending business in that state. Refer to the "Scope" section under each State Rating section for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the two state ratings. The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings. To conclude on FNBSF's overall record of performance, we assessed activities in the AAs under the Lending, Investment, and Services Tests. The rating methodology is structured such that the Lending Test is weighted most heavily of the three tests.

Based on the portion of reported lending during the evaluation period, the Santa Fe AA received the most weight. This area constitutes 51 percent of the bank's total deposit base and 32 percent of all residential mortgage and small business loans made in the FNBSF's AAs during the evaluation period. The Denver AA received the next highest weighting with 15 percent of total deposits and 23 percent of all the residential mortgage and small business loans. The Albuquerque AA obtained the next level of weighting with nine percent of all the bank's deposits and 23 percent of the residential mortgage and small business loans made during the evaluation period. The remaining AAs hold nine percent of the total deposits and 23 percent of HMDA and CRA loans.

The bank's poor lending activity in New Mexico is mitigated by the bank's strategic initiatives and economic conditions during the evaluation period. As noted previously, after the merging of three troubled banks just prior to this CRA evaluation period, substantial resources were committed to enhancing bank leadership; improving credit quality and operational efficiencies; and turning its focus, dedication and commitment to CRA. In addition, the low incomes and high poverty rates in New Mexico limit the opportunities for making or purchasing mortgages targeted to LMI populations in the state and financing small business loans.

***Inside/Outside Ratio***

This ratio is a bank-wide ratio and not calculated by individual AAs. Analysis is limited to bank originations and purchases and does not include any affiliate data. For the evaluation period, a substantial majority of FNBSF's loans were made inside its designated AAs. Specifically, 89.04 percent of all home mortgage loans by number and 88.94 percent of small business loans by number were inside the bank's designated AAs.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

## State Rating

### State of New Mexico

#### CRA Rating for New Mexico:

**The lending test is rated: Low Satisfactory**

**The investment test is rated: High Satisfactory**

**The service test is rated: High Satisfactory**

- FNBSF's CD lending in the Albuquerque AA and Santa Fe AA had a positive impact on the Lending Test rating and is considered excellent in both areas.
- The volume of FNBSF's qualified investments is excellent in the Albuquerque AA and adequate in the Santa Fe AA in relation to the investment opportunities and is responsive to identified needs.
- FNBSF's branches are reasonably accessible to geographies and individuals of all income levels. The level and nature of the bank's CD services are adequate in the Albuquerque AA and relatively high in the Santa Fe AA.
- FNBSF's lending activity in the Albuquerque AA is adequate. Geographic distribution for HMDA loans is adequate but borrower distribution is poor. Borrower distribution for small business lending in the AA is adequate. Geographic distribution for small business loans is excellent.
- FNBSF's lending activity in the Santa Fe AA is poor. Borrower and geographic distribution for HMDA loans is poor. Borrower and geographic distribution for small business loans is poor.

### Description of Institution's Operations in New Mexico

FNBSF is headquartered in and has significant operations in New Mexico. Just over half of the bank's deposits, 51 percent, are within the Santa Fe AA. Approximately nine percent of bank deposits are in the Albuquerque AA. New Mexico also accounts for a significant amount of the lending with 182 home mortgages and 230 small business loans extended during the review period. FNBSF operates in four designated AAs in New Mexico, with the Santa Fe MSA representing the largest portion of deposits and loans. The bank has also identified the Las Cruces MSA and Los Alamos County as AAs. Albuquerque is the fourth AA but consists only of Bernalillo County. FNBSF's 21.3 percent deposit market share represents the second most significant market share amongst the 11 institutions operating in the Santa Fe MSA. FNBSF's deposit market share is much smaller in the Albuquerque, Las Cruces, and Los Alamos markets.

Refer to the market profiles for the state of New Mexico in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## Scope of Evaluation in New Mexico

We completed full-scope reviews for the Albuquerque and Santa Fe AAs, which represents the majority of lending and deposits for the institution within the state. We performed limited-scope reviews for the Las Cruces AA and Los Alamos AA. The New Mexico State Rating is weighted fairly equally on the Lending Test for the two full-scope AAs. FNBSF's percentage of deposits is most prevalent in the Santa Fe AA, but the two full-scope AAs have a more comparable dollar volume of lending. Ratings are based primarily on results of those areas that received full-scope reviews. See Appendix A for a more detailed market profile of the Albuquerque and Santa Fe AAs.

Two community development organizations were contacted during this examination. The Albuquerque organization stated that some small businesses owners find access to capital at banks challenging or non-existent. Another organization noted that housing costs in Santa Fe are high relative to incomes for a majority of Santa Fe residents, making home-ownership a challenge for many. Approximately 50 percent of the people who work in Santa Fe live somewhere else. As a result, we gave additional consideration to CD loans, investments, and services that met the need for small business and affordable housing needs in the full-scope AAs.

As noted in the performance context section, in 2012 three banks merged into the current FNBSF charter. Each of the three banks were in troubled condition prior to the acquisitions. During 2013 and 2014, bank management committed substantial resources in unifying the three banks by enhancing bank leadership; improving credit quality and operational efficiencies; and turning its focus, dedication, and commitment to CRA. During 2015, the bank has implemented numerous improvements to the CRA program. Those improvements include development of a new business line dedicated to the CRA; expanded CD leadership that resulted in increased CD lending, investments, and services; efforts to increase HMDA lending to LMI individuals; and training to educate all staff.

## LENDING TEST

The bank's performance under the lending test for the state of New Mexico is rated "Low Satisfactory". In reaching this conclusion, we considered the high level of competition from other lenders, the bank's focus on merging the three banks, and the weak economic conditions in New Mexico during the evaluation period.

The lack of affordable housing in the state is critical, and the low incomes and high rates of poverty, along with the largely rural character of the state, limit the opportunities for making or purchasing mortgages targeted to LMI populations. As noted in comments below, 2013 statistics in both Albuquerque and Santa Fe reflect significant percentages of the population living below the poverty level combined with average median housing values above \$200,000 and \$300,000 respectively. As such, it is difficult for LMI families to find affordable housing.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's lending performance in the Albuquerque AA is adequate and poor in the Santa Fe AA. Current period loans represented 7.8 percent of allocated tier one capital for the Santa Fe AA, and 46.9 percent for the Albuquerque AA.

### **Lending Activity**

The bank's overall lending in the State of New Mexico is "Low Satisfactory". This is primarily based on the bank's performance in the Albuquerque and Santa Fe AAs. In reaching this conclusion, we considered the strong competition from other lenders, the overall weak economic conditions in New Mexico during the evaluation period, and the merger of the three bank charters into one. Refer to Table 1 Lending Volume and Other in the state of New Mexico section of appendix D for the facts and data used to evaluate the bank's lending activity.

FNBSF's lending activity in the Albuquerque AA is adequate. As of June 30, 2015, FNBSF reported 0.93 percent market share of deposits and is ranked tenth out of 24 financial institutions. The bank's market share of small business loans by dollar volume is 2.87 percent, which exceeds its deposit market share. They are ranked 18<sup>th</sup> out of 66. However, the market share of home purchase and refinance are lower and total 0.62 and 0.42 percent in dollar volume, where they are ranked 49<sup>th</sup> and 72<sup>nd</sup> out of approximately 200 lenders.

FNBSF's lending activity in Santa Fe AA is poor. As of June 30, 2015, FNBSF reported a 21.30 percent market share of deposits and is ranked second out of 11 financial institutions. The bank's market share of small business lending by dollar volume is 13.47 percent, which is lower than its deposit market share. In addition, the market share of home purchase and refinance are significantly lower and total 2.1 and 2.03 percent in dollar volume

For the Albuquerque AA, small loans to businesses and mortgage lending received approximately the same weight under the Lending Test. For the Santa Fe AA, small loans to businesses received the most weight under the lending test. We did not evaluate home improvement small loans to farms for either AA, as the bank did not originate or purchase a sufficient number of these loans during the evaluation period to analyze.

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

The overall geographic distribution of loans for the state of New Mexico is "Low Satisfactory". As previously noted, we placed equal weight on the bank's home mortgage and small business lending for the Albuquerque AA and more weight on business lending for the Santa Fe AA. We did not evaluate small farm and home improvement loans as the bank did not originate or purchase a sufficient number of these loans to analyze during the evaluation period.

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

Refer to Tables 2, 3, 4, and 5 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of home mortgage loans.



Albuquerque AA

The geographic distribution of home purchase loans is adequate. Performance in moderate-income tracts is adequate. FNBSF had excellent performance in low-income tracts and exceeded demographics. The geographic distribution of home refinance loans is adequate. Performance in moderate-income tracts is poor. Performance in low-income tracts is excellent and exceeds demographics. The bank did not originate or purchase a sufficient number of home improvement or multifamily lending loans during the evaluation period to analyze and so we did not perform an evaluation.

Santa Fe AA

The geographic distribution of home purchase loans is poor. Performance in moderate-income tracts is poor and significantly lower than demographics. FNBSF made no loans in low-income tracts. The geographic distribution of home refinance loans is adequate. The bank made no loans in moderate-income tracts. Performance in low-income tracts for home refinance is good and exceeds demographics. The bank did not originate or purchase a sufficient number of home improvement or multifamily lending loans during the evaluation period to analyze and so we did not perform an evaluation.

***Small Loans to Businesses***

Refer to Table 6 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the state of New Mexico is adequate. The geographic distribution of small loans to businesses in the Albuquerque AA is excellent. The dispersion of small loans to businesses within the LMI geographies exceeds area demographics. The geographic distribution of small loans to businesses in the Santa Fe AA is poor. The dispersion of small loans to businesses within the LMI geographies is significantly lower than area demographics.

***Small Loans to Farms***

Refer to Table 7 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to farms.

An analysis of small loans to farms is not applicable. These analyses were not performed as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze for either the Albuquerque or Santa Fe AAs.

***Lending Gap Analysis***

Our geographical distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous lending gaps for either the Albuquerque or Santa Fe AAs.

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

The overall borrower distribution of loans is poor. As previously noted, we placed equal weight on the bank's home mortgage and small business lending for the Albuquerque MSA and more weight on business lending for the Santa Fe AA. We did not evaluate small farm and home improvement loans as

the bank did not originate or purchase a sufficient number of these loans during the evaluation period to analyze.

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

Refer to Tables 8, 9 and 10 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and/or purchases of home mortgage loans.

#### **Albuquerque AA**

The distribution of home mortgage loans to borrowers of different income levels is poor. The percentage of families below poverty level is 14.4 percent. The borrower distribution of home purchase loans is poor. The percentage of loans to low-income borrowers is very poor and significantly lower than demographics. The percentage of loans to moderate-income borrowers is poor and lower than demographics. The borrower distribution of home refinance loans is very poor. The bank made no loans to LMI borrowers. We did not evaluate home improvement or multifamily lending, as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze.

#### **Santa Fe AA**

The distribution of home mortgage loans to borrowers of different income levels is poor. The percentage of families below poverty level is 13.3 percent in the Santa Fe AA. The borrower distribution of home purchase loans is poor. The percentage of loans to low and moderate-income borrowers is poor and below demographics. The borrower distribution of home refinance loans is poor. The bank made no loans to low-income borrowers and the distribution of home refinance borrowers to moderate-income borrowers is poor and below demographics. We did not evaluate home improvement and multifamily lending, as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze.

As noted previously, affordable housing is a critical need in the state. However, high rates of poverty combined with high housing costs limit the opportunities for the bank to make or purchase mortgages targeted to LMI populations in the state. In 2013, New Mexico had 21.9 percent of its population living below the poverty level, the second highest in the country. With a weighted average median housing value of \$337,063 in Santa Fe MSA and \$200,408 in the Albuquerque AA, it is difficult for LMI families to afford housing. Family income for low-income individuals for the Santa Fe AA would be below \$32,000 and up to \$51,000 for moderate-income individuals. For Albuquerque, family income for low-income individuals would be \$30,000 and up to \$47,500 for moderate-income individuals.

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

Refer to Table 11 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to businesses.

Albuquerque AA

The distribution of small loans to businesses of different revenue sizes in the Albuquerque AA is adequate. The percentage of loans to businesses with revenues of \$1 million or less is significantly below area demographics. For informational purposes, using loan size as a proxy, 24 percent of the bank's loans have loan origination amounts of \$100,000 or less and 28 percent have loan origination amounts ranging from \$100,000 to \$250,000. Market share performance is adequate and near to demographics.

Santa Fe AA

The distribution of small loans to businesses of different revenue sizes in the Santa Fe AA is adequate. The percentage of loans to businesses with revenues of \$1 million or less is significantly below area demographics. For informational purposes, using loan size as a proxy, 60 percent of the bank's loans have loan origination amounts of \$100,000 or less and 21 percent have loan origination amounts ranging from \$100,000 to \$250,000. Market share performance is adequate and above demographics.

***Small Loans to Farms***

Refer to Table 12 in the state of New Mexico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to farms.

An analysis of small loans to farms is not applicable. Small loans to farms are not a primary credit need for the Albuquerque or Santa Fe AAs.

**Community Development Lending**

Refer to Table 1 Lending Volume in the state of New Mexico section of appendix D 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.

CD lending activities had a positive impact on the New Mexico Lending Test. FNBSF has made a relatively high level of community development loans given its size, lending capacity and area opportunities. The bank made four loans during the assessment period that represents approximately seven percent of total tier one capital.

We gave consideration to four statewide community development loans totaling \$10.3 million. These loans do not have the potential to benefit the AAs. However, they financed a small business that provided and retained jobs to LMI individuals in Clovis, NM.

Albuquerque AA

The bank originated two CD loans totaling \$5.5 million in the Albuquerque AA. Both loans provide economic development to the AA by providing loans for warehouses/offices with LMI employment.

Santa Fe AA

The bank originated two CD loans totaling \$7 million in the Santa Fe AA. This includes a loan to provide economic development to the MSA by providing loans for construction of a casino on tribal land and a loan that provides affordable housing with Habitat for Humanity.

**Product Innovation and Flexibility**

FNBSF did not participate in any CRA-qualified innovative or flexible loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Refer to Tables 1 through 15 in the state of New Mexico section of Appendix D for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Las Cruces AA is consistent with the bank's overall "Low Satisfactory" performance under the Lending Test in New Mexico. The geographic distribution of small loans to businesses is adequate and the borrower distribution is excellent. There were no small loans to businesses in the Los Alamos AA. Home mortgage lending to these two areas was insignificant. The bank had no CD loans in the Las Cruces and Los Alamos AAs. The combined limited-scope AA performance had a neutral impact on the bank's overall rating in the state.

### **INVESTMENT TEST**

The bank's performance under the investment test in New Mexico is rated "High Satisfactory".

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Santa Fe AA is adequate and the Albuquerque AA is excellent. We gave consideration for statewide investments that benefit the AA, which had a neutral impact on the overall Investment Test rating. Current period investments represented 2.0 percent of allocated tier one capital for the Santa Fe AA and 24.4 percent for the Albuquerque AA.

Refer to Table 14 in the state of New Mexico section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

#### Santa Fe AA

Based on a full-scope review, the bank's performance in the Santa Fe AA is adequate. Qualified investments for the AA total \$1.8 million and represents 30 percent of the bank's CD investments in the state of New Mexico. The bank made one investment that was innovative by working with the agency to secure the mortgage-backed securities. The remainder of the investments is non-complex, but responsive to identified community development needs for affordable housing and economic development. Current period investments total \$333,000. The investments primarily consist of:

- \$280,000 invested in affordable housing mortgage loan pools; and
- \$53,000 in charitable donations to area organizations that provide targeted services for LMI individuals and families.

Prior period investments consist of \$1.5 million in a Community Development Financial Institution (CDFI) to secure affordable housing in the AA. More weight was given to current period investments in assigning the overall investment rating.

Albuquerque AA

The bank's performance in the Albuquerque AA is excellent. Qualified investments for the AA total \$3.9 million and represents 64 percent of the bank's CD investments in the state of New Mexico. The investments are non-complex, but responsive to identified community development needs for affordable housing and economic development. Current period investments total \$3.9 million. The investments primarily consist of:

- \$47,000 invested in economic development to provide training, support, and seed money to small businesses;
- \$3.8 million invested in affordable housing mortgage loan pools; and,
- \$15,000 in charitable donations to area organizations that provide targeted services for LMI individuals and families.

We gave positive consideration to statewide investments totaling \$104,000 originated within the state of New Mexico. The investments consist of CDFI funds that have the potential to benefit any AA in the state of New Mexico. The CDFI invests in affordable housing and other community assets to improve economic opportunities of low-income persons and communities.

The statewide investment total also includes \$51,000 in donations to various organizations for affordable housing, community services, and economic development. The community service programs provide childcare to low-income families, promote healthy living, and provide dental services. The affordable housing program places homeless and those with limited incomes in affordable housing while training them for jobs, and the economic development program assists low-income individuals with training to help them grow their small businesses. These have the potential to benefit any AA in the state of New Mexico.

The bank made a regional donation that supports a broader area including New Mexico. The donation provides economic development through a CDFI. They provide training and other services to small businesses. It has the potential to benefit any AA in the state of New Mexico or Colorado.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Las Cruces AA and Los Alamos AA is weaker than the bank's overall "High Satisfactory" performance under the investment test in New Mexico. In the Los Cruces AA, the level of qualified investments is adequate. In the Los Alamos AA, the level of qualified investments is poor. Performance in limited-scope AAs does not impact the overall conclusions. Refer to Table 14 in the state of New Mexico section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in New Mexico is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Santa Fe AA is good and Albuquerque AA is adequate.

## **Retail Banking Services**

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

### Albuquerque AA

#### **Retail Banking Services**

The bank's delivery systems are reasonably accessible to essentially all portions of the bank's Albuquerque AA. No branches are located in low-income CTs, but only 8.07% of low and moderate-income families live in low-income CTs. There is one branch located in a moderate-income CT, compared to 45.84% of low and moderate-income families living in moderate-income CTs. The bank's other two branches are located in middle-income CTs; however, one of those branches is accessible to pedestrians and just across the street from a moderate-income CT. There was one branch relocation that occurred in October 2015 and resulted in a branch moving from a moderate-income CT to a middle-income CT. This relocation was less than 0.2 miles and consisted of the branch moving across and further down a main road in Albuquerque to increase visibility. This relocation has not adversely affected the accessibility of its delivery systems to low and moderate-income individuals. There are no branches located in upper-income CTs.

The bank is also a member of the Allpoint ATM Network. This network provides surcharge-free ATM services to all member bank accountholders at over 55,000 locations worldwide. These ATMs are primarily located in convenient locations such as grocery stores and convenience stores. Additionally, the bank has two deposit taking ATMs in the Albuquerque AA, located in the Mountain Road and Uptown branches.

The bank offers a wide range of retail services that are consistent within all branches. Products, services, and hours are reasonable and do not inconvenience low or moderate-income individuals. Alternative service delivery systems include phone banking services, internet banking, and automatic bill-pay services, which are available to all customers. Bilingual customer service representatives are available at the call center as well as one branch in the Albuquerque AA. Refer to FNBSF's CRA Public File for a current list of available products and services.

#### **Community Development Services**

FNBSF provided an adequate level of community development services in the Albuquerque AA. Bank staff provided 455 hours of technical assistance to eight different organizations in the Albuquerque AA, during the evaluation period. Services include providing financial and strategic expertise to organizations through board positions, providing credit expertise on loan committees, leading and assisting with fundraising activities, and providing internships to students. The bank's CD service efforts have focused on economic development. They are also working with organizations to provide community services and affordable housing to low and moderate-income individuals in the Albuquerque AA.

One example of a CD service that addresses the AA's need for economic development is a bank employee that served as Secretary/Treasurer for the Albuquerque West Side Chamber of Commerce. The Albuquerque West Side Chamber of Commerce is dedicated to the general economic development of Albuquerque's west side and provides training and services to local small businesses. In addition to providing financial expertise in her role as Treasurer, she also offered training on how to apply for SBA

loans and provided information on banking products and services. Another example of a CD service is a loan officer who sits on the finance committee and contributes his financial expertise to El Ranchito De Los Ninos, a non-profit organization that provides an alternative to foster care. Their focus is on keeping siblings together while giving them a stable home.

### Santa Fe AA

#### **Retail Banking Services**

The bank's delivery systems are reasonably accessible to most portions of the bank's assessment area. Seven branches are located throughout the city of Santa Fe. No branches are located in low-income tracts, though only 9.86% of LMI families live in low-income tracts. There are no branches in moderate-income tracts, which house 34.44% of LMI families. However, two of the bank's seven branches are within walking distance of moderate-income census tracts and are easily accessible to pedestrians. Another branch borders a low-income CT and is easily accessible to pedestrians.

In addition to the bank's three ATM only locations, which are located in middle and upper-income CTs of Santa Fe, the bank is also a member of the Allpoint ATM Network. This network provides surcharge-free ATM services to all member bank account holders at over 55,000 locations worldwide. These ATMs are primarily located in convenient locations such as grocery stores and convenience stores. However, the bank's only deposit taking ATMs are located in the bank branches. The bank also has a "mobile office" providing services at El Castillo Retirement Residences in Santa Fe. Services at this office consist of account opening, check cashing and deposit taking for customers with limited mobility.

The bank offers a wide range of retail services that are consistent within all branches. Products, services, and hours are reasonable and do not inconvenience LMI individuals. Alternative service delivery systems include phone banking services, internet banking, and automatic bill-pay services, which are available to all customers. Bilingual customer services representatives are available at the call center as well as in all of the branches located in the Santa Fe AA. Refer to FNBSF's CRA Public File for a current list of available products and services.

#### **Community Development Services**

FNBSF provided a good level of community development services in the Santa Fe AA. Bank staff provided 785 hours of technical assistance to 14 different organizations in the Santa Fe MSA during the evaluation period. Services include providing financial and strategic expertise to organizations through board positions, providing credit expertise on loan committees, leading and assisting with fundraising activities, and teaching budgeting and financial education classes. Although the majority of services consist of community services targeting LMI individuals, FNBSF staff also provides expertise to organizations committed to providing affordable housing in the Santa Fe AA.

One example is Esperanza Shelter, an organization committed to providing affordable housing and other services for battered families. The bank made its largest time contribution to this organization, with two employees contributing 365 hours during the assessment period. Another example of community service in the AA would be the bank's involvement in the Santa Fe Public School District. Three bank employees contributed 57 hours during the evaluation period instructing students in financial literacy through various programs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

New Mexico AAs outside of the Albuquerque and Santa Fe AAs include the Las Cruces AA and the Los Alamos AAs. Based on our limited-scope review, the bank's performance under the service test in Las Cruces is consistent with the bank's overall performance in the state. In 2015, the bank sponsored the first Money Smart Week in New Mexico. This weeklong public awareness campaign was created by the Federal Reserve Bank to help consumers better manage their finances. Following the success of the 2015 Money Smart Week in Las Cruces, the bank is planning to expand the program to Santa Fe and Albuquerque in 2016. No CD services were identified in the Los Alamos AA; however, opportunities for qualified CD services are limited due to the limited number of LMI individuals living in Los Alamos County. Performance differences in limited-scope areas were not significant enough to impact the bank's overall rating.



## State Rating

### State of Colorado

#### CRA Rating for Colorado:

**The lending test is rated: High Satisfactory**

**The investment test is rated: Outstanding**

**The service test is rated: Low Satisfactory**

The major factors that support this rating include:

- FNBSF's geographic and borrower distribution of small business loans reflects good and adequate responsiveness to the AAs credit needs, respectively.
- FNBSF's CD lending has a positive impact on the AA and is considered excellent given the bank's size, lending capacity, and area opportunities.
- FNBSF's CD investments level is excellent in relation to the investment opportunities and is responsive to identified needs in the Denver AA.
- FNBSF's branches are reasonably accessible to geographies in relation to the individuals of all income levels. The level and nature of the banks CD services is adequate in the Denver AA.

### Description of Institution's Operations in Colorado

FNBSF's operations in the state of Colorado are lesser than in New Mexico but included four AAs during the evaluation period. The assessment areas in Colorado during the evaluation period included the Denver-Aurora-Lakewood MSA, Boulder MSA, Fort Collins MSA, and Lincoln County. FNBSF currently has seven branches, including one ATM in each branch in the state. The bank recently closed the branch in the Limon, Colorado. In addition, the bank is part of a nationwide ATM network that is available to Colorado-based customers. The Denver and Boulder AA branches account for 28 percent of the bank's deposits. As of June 30, 2015, FNBSF's deposit market share in the Denver and Boulder AAs totaled 0.36 and 1.96 percent, respectively. Lending in the State of Colorado during the evaluation period totaled 21 home mortgage and 172 small business loans.

Refer to the market profiles for the state of Colorado in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in Colorado

We performed a full-scope review for the Denver AA, which represents the largest percentage of all the lending and deposits for the institution within the State. Management has identified three other AAs, which received limited scope reviews within the state of Colorado, including the Boulder MSA, Fort Collins MSA, and Lincoln County. The bank's identified Denver AA is exactly the same as the Denver-Aurora-Lakewood MSA. The ratings for Colorado are based primarily on the results of the Denver AA, which received a full-scope review. Refer to Appendix A for specific information on the listing of assessment areas and the type of examination each AA received.

OCC examiners conducted a community contact interview with an organization that provides housing assistance to LMI households. The contact stated they had a neutral perception of area financial institutions. The community contact stated that there are opportunities for financial institutions to better serve the LMI community through apartment development projects, improved and simplified communication to LMI households, and assistance with financial education to LMI communities.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Colorado is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Denver-Aurora-Lakewood MSA is good. Current period loans represented 199% of allocated tier one capital for the Denver AA.

### **Lending Activity**

Refer to Table 1 Lending Volume and Other in the state of Colorado section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. FNBSF ranks 32 out of 145 in deposit market share in the Denver AA at 0.36 percent. For small loans to businesses, FNBSF ranks 34 out of 149 lenders with 0.63 percent by dollar volume. Small loans to businesses received the most weight under the Lending Test. These loans represent 89 percent by number and 69 percent by dollar volume of total reported loans in the Denver AA.

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

The overall geographic distribution of loans for the state of Colorado is good. As previously noted, we placed more weight on the bank's small loans to businesses loan performance. We did not evaluate home mortgage loans or small loans to farms as the bank did not originate or purchase a sufficient number of these loans during the evaluation period to analyze.

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

Refer to Tables 2, 3, 4, and 5 in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of home mortgage loans.

We did not evaluate home mortgage lending. These analyses were not meaningful as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze.

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

Refer to Table 6 in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the state of Colorado is good. The geographic distribution of small loans to businesses in the Denver AA is good. The dispersion of small loans to businesses within the LMI geographies exceeds area demographics.

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

Refer to Table 7 in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to farms.

An analysis of small loans to farms is not applicable. These analyses were not performed as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze.

### ***Lending Gap Analysis***

Our geographical distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any conspicuous lending gaps.

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

The overall borrower distribution of loans is adequate. As noted earlier, we placed more weight on the bank's small loans to businesses loan performance. We did not evaluate home mortgage loans or small loans to farms as the bank did not originate or purchase a sufficient number of these loans during the evaluation period to analyze.

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

Refer to Tables 8, 9 and 10 in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and/or purchases of home mortgage loans.

We did not evaluate home mortgage or multifamily lending. These analyses were not performed as the bank did not originate or purchase a sufficient number of loans during the evaluation period to analyze.

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

Refer to Table 11 in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to businesses.

The distribution of small loans to businesses of different revenue sizes in the Denver AA is adequate. The percentage of loans to businesses with revenues of \$1 million or less is significantly below area demographics. For informational purposes, using loan size as a proxy, 24 percent of the bank's loans have loan origination amounts of \$100,000 or less and 30 percent have loan origination amounts ranging from \$100,000 to \$250,000. FNB's market share performance is excellent. The bank's market share of loans to small businesses with revenues of \$1 million or less is less than one percent and exceeds the bank's overall market share.

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

Refer to Table 12 in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of small loans to farms.

An analysis of small loans to farms is not applicable. Small loans to farms are not a primary credit need for this AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Colorado section of appendix D 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.

CD lending activities had a positive impact on the Colorado Lending Test. FNBSF's responsiveness under the CD lending test is excellent given its size, lending capacity and area opportunities. The bank originated 14 CD loans totaling \$52 million in the Denver AA. This includes nine loans to provide economic development within the AA by building a new brewery, commercial office space, and construction of a new stadium. This also included one loan to provide affordable housing in a low-income tract. The bank provided one loan for revitalization and stabilization as part of an urban renewal plan bringing new construction and jobs for LMI persons.

### **Product Innovation and Flexibility**

FNBSF bank did not participate in any CRA-qualified innovative or flexible loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Collins and Boulder AAs is consistent with the bank's overall "High Satisfactory" performance under the Lending Test in Colorado. The bank's performance under the Lending Test in the Lincoln County AA is weaker than the bank's overall performance. Refer to Tables 1 through 15 in the state of Colorado section of Appendix D for the facts and data that support these conclusions.

In the Boulder and Fort Collins AAs, the overall geographic distribution of loans to small businesses is excellent and the borrower distribution is adequate and excellent, respectively. The home mortgage and multifamily lending to these two AAs was insignificant. The Lincoln County AA had no small loans to businesses or home mortgage loans and an insignificant amount of small loans to farms.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in Colorado is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Denver AA is excellent. We gave positive consideration for statewide investments that benefit the AA, which impacted the overall Investment Test rating.

Current period investments represented 19.6 percent of allocated tier one capital for the AA. Refer to Table 14 in the state of Colorado section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on a full-scope review, the bank's performance in the Denver AA is excellent. Qualified investments for the AA total \$5.1 million and represents 60 percent of the bank's CD investments in the state of Colorado. The investments are non-complex, but responsive to identified community development needs for community services, affordable housing, and economic development. Current period investments total \$5.1 million. The investments primarily consist of:

- \$5.1 million invested in affordable housing mortgage loan pools; and
- \$57,000 in charitable donations to area organizations that provide targeted services for LMI individuals and families.

We gave positive consideration to statewide investments totaling \$103,000 originated within the state of Colorado. One investment consisted of CDFI funds that have the potential to benefit any AA in the state of Colorado. The CDFI invests in affordable housing and other community assets to improve economic opportunities of low-income persons and communities. The statewide investment total also includes \$3 thousand in donations to one organization for affordable housing. The community service program provides affordable housing to prevent homelessness. These have the potential to benefit any AA in the state of Colorado.

The bank made a regional donation that supports a broader area outside of Colorado. The donation provides economic development through a CDFI. They provide training and other services to small businesses. It has the potential to benefit any AA in the state of New Mexico or Colorado.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Fort Collins AA is consistent with the bank's overall "Outstanding" performance under the investment test in Colorado due to the excellent level of qualified investments in the AA. The bank's performance under the investment test in the Boulder AA and Lincoln County AA are weaker than the bank's overall "Outstanding" performance under the investment test in Colorado. In the Boulder AA, the level of qualified investments is good compared to the overall deposits in the AA. Lincoln County AA's level of qualified investments is very poor. The combined limited-scope AA performance had a neutral impact on the bank's overall rating in the state. Refer to the Table 14 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in Colorado is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Denver AA is adequate.

## **Retail Banking Services**

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

The bank's delivery systems are reasonably accessible to individuals and geographies of different income levels in the Denver AA. FNBSF has three branches located in the Denver AA. No branches are located in low-income CTs, though 19.33% of LMI families live in low-income tracts. One branch is located in a moderate-income tract, and two others are located in upper-income tracts. Both branches located in upper income CTs are within a half-mile radius of moderate income tracts. The lower downtown Denver branch is easily accessible via public transportation.

FNBSF closed six branches in the Denver AA during the evaluation period. Three branches were closed in the fourth quarter of 2013 due to insufficient activity following the Mile High Bank acquisition. None of these branches were located in LMI tracts. On December 30, 2015, another three branches located in the Denver AA closed. Again, these closures were due to insufficient activity, and none of the branches were located in LMI CTs. Overall, the bank's record of closing branches has not adversely affected the accessibility to LMI geographies or individuals.

The bank's only deposit taking ATMs are located in bank branches, each of which has a deposit taking ATM. In addition, the bank is part of the Allpoint ATM Network. This network provides surcharge-free ATM services to all member bank accountholders at over 55,000 locations worldwide. These ATMs are primarily located in convenient locations such as grocery stores and convenience stores.

The bank offers a wide range of retail services that are consistent within all branches. Products, services, and hours are reasonable and do not inconvenience LMI individuals. Alternative service delivery systems include phone banking services, internet banking, and automatic bill-pay services, which are available to all customers. Bilingual customer services representatives are available at the call center as well as the lower downtown Denver branch. Refer to FNBSF's CRA Public File for a current list of available products and services.

## **Community Development Services**

FNBSF provided an adequate level of community development services in the Denver AA. Bank staff provided 463 hours of technical assistance to 10 different organizations in the Denver AA during the evaluation period. No CD services were identified in 2013; however, the bank made rapid progress providing CD services in the Denver AA in 2014 and 2015. The vast majority of these services were provided in 2015. Services include providing financial and strategic expertise to organizations through board positions, providing credit expertise on loan committees, leading and assisting with fundraising activities, and teaching budgeting and financial literacy classes. Although the majority of services consist of community services targeting LMI individuals, FNBSF staff also provides expertise to organizations committed to providing affordable housing to LMI families in the Denver AA.

One example of providing services to LMI individuals is through the Warren Village project. Warren Village assists low-income single families achieve personal and economic self-sufficiency by providing affordable housing, family services, and classes. Seven leaders within the organization teach a Life Skills course to participants of the program. Additionally, two employees created three financial education classes for the program.

Another example of CD services provided is a director that provides financial and fundraising expertise as a board member of the Denver Scholarship Foundation. This non-profit organization empowers Denver Public School students to pursue postsecondary education by providing the tools, knowledge, and financial resources needed for success.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Colorado AAs outside of the Denver AA include the Boulder MSA, Fort Collins MSA, and Lincoln County. Based on our limited-scope review, the bank's performance under the Service Test in the Boulder and Fort Collins AAs is consistent with the bank's "Low Satisfactory" performance in the state of Colorado. FNBSF has three branches in Boulder, two of which are located in moderate income CTs, while the third is located in a middle-income CT. CD services in the Boulder AA were limited to one organization, the Longmont Housing Corp. A bank employee sits on the board and provides financial expertise to this non-profit arm of the housing authority. The bank has one branch in the Fort Collins AA, which is located in a middle-income AA, but is within a half-mile radius of a moderate-income CT. CD services in the Fort Collins AA are limited to one organization as well, the Larimer County Boys and Girls Club. A bank employee serves on the advisory board of the organization, developing and implementing budget planning.

The bank's performance under the Service Test in the Lincoln County AA is weaker than the bank's overall performance in Colorado. The bank had one branch in the AA, which was located in one of two middle-income CTs that make up Lincoln County. The bank sold this branch in February 2016. No CD services were identified in the Lincoln County AA; however, opportunities for qualified CD services are limited in the AA, as 100% of the population is considered middle-income. Overall, performance differences in limited-scope areas were not significant enough to impact the bank's overall 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/2014 to 01/01/2015) Investment and Service Tests and CD Loans: (03/31/2013 to 03/31/2016)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First Name Bank of Santa Fe (FNBSF) 2101 Mountain Road, NW, Suite A Albuquerque, New Mexico 87104	HMDA and CRA Loans; CD Loans, Investments, and Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None Reviewed		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
New Mexico Albuquerque Santa Fe MSA Las Cruces MSA Los Alamos County  Colorado Denver-Aurora-Lakewood MSA Boulder MSA Fort Collins MSA Lincoln County	Full Scope Full Scope Limited Scope Limited Scope  Full Scope Limited Scope Limited Scope Limited Scope	The bank’s Albuquerque AA only includes Bernalillo County.



## Appendix B: Summary of State Ratings

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RATINGS FIRST NATIONAL BANK OF SANTA FE				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Santa Fe	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
New Mexico	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### State of New Mexico

### Albuquerque MSA

Demographic Information for Full-Scope Area: Albuquerque MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	153	5.88	27.45	33.33	33.33	0.00
Population by Geography	662,564	5.57	32.22	30.91	31.30	0.00
Owner-Occupied Housing by Geography	167,303	2.68	27.57	32.77	36.98	0.00
Businesses by Geography	47,940	7.30	27.84	32.81	32.05	0.00
Farms by Geography	807	4.71	25.77	34.20	35.32	0.00
Family Distribution by Income Level	159,338	22.36	17.46	18.92	41.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	63,442	8.06	45.84	29.64	16.45	0.00
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below the Poverty Level	= \$59,381 = \$57,800 14%	Median Housing Value Unemployment Rate				\$200,408 3.21%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census and 2015 HUD updated MFI.

The Albuquerque MSA covers a total of four counties, including Bernalillo County, Sandoval County, Torrance County, and Valencia County. The bank has designated only Bernalillo County as their assessment area. Bernalillo County accounts for nearly 23 percent of all residential mortgage loans and small business loans made in 2014 and 2015. The assessment area also account for nine percent of the bank's deposits. Competition in this area is high. There are 24 institutions having 130 branches located in Bernalillo County. FNBSF's deposit market share ranks tenth with a deposit share of 0.93 percent. Competition includes large national banks and state banks.

There are three branches located in the Bernalillo County assessment area. One branch is located in a moderate-income census tract, while the other two branches are located in middle-income tracts. One branch in a middle-income tract is across the street from a moderate-income tract and is easily accessible to pedestrians. Two of the branches have ATMs.

Bernalillo County is the most populous county in the state of New Mexico, and Albuquerque, the county seat, is the most populous city in the state. As of 2015, the unemployment rate for the Albuquerque AA was 3.21 percent, below the national average of 5.0 percent. The largest employer in Bernalillo County is government, followed by the University of New Mexico, and Presbyterian Healthcare Services. The 2015 HUD-adjusted median family income in the AA was \$57,800; however, 14 percent of households live below the poverty line.

There are numerous CD organizations which provide affordable housing and community services to LMI individuals, economic development activities, revitalization of LMI areas, and small business financial and educational support in Bernalillo County. This provides financial institutions with ample opportunity to provide qualified CD loans, investments, and services.

One CD organization was contacted during this examination. This organization is dedicated to providing the tools entrepreneurs need to start, operate, or grow their businesses. They also work with underserved businesses who find access to capital at banks challenging or non-existent. The organization stated that several LMI individuals are turning to online lenders instead of banks or nonprofits due to regulatory requirements, which delays credit decisions at banks.

## State of New Mexico

### Santa Fe, NM MSA

Demographic Information for Full-Scope Area: Santa Fe MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	4.00	20.00	38.00	36.00	2.00
Population by Geography	144,170	5.94	23.86	35.11	34.44	0.64
Owner-Occupied Housing by Geography	42,824	3.42	20.89	34.30	41.40	00.00
Businesses by Geography	15,408	9.26	10.99	41.80	37.88	0.06
Farms by Geography	365	4.66	12.33	35.07	47.95	0.00
Family Distribution by Income Level	35,757	23.60	16.10	18.88	41.42	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	14,194	9.86	34.44	34.35	21.15	0.20
Median Family Income = \$64,041		Median Housing Value = \$337,063				
HUD Adjusted Median Family Income = \$65,300		Unemployment Rate = 3.56%				
for 2015						
Households Below the Poverty Level 13%						

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

Source: 2010 U.S. Census, and 2015 HUD updated MFI.

The Santa Fe AA is the same as the MSA and covers Santa Fe County. FNBSF operates seven branches in the Santa Fe AA. There is an ATM at each branch and three ATM only locations. In addition, FNBSF operates a mobile office in the Santa Fe AA located in middle-income census tracts for a retirement community. FNBSF's business focus in the Santa Fe AA is commercial and residential real estate lending. All of the branches and ATMs are located in middle and upper-income tracts. Two of the banks seven branches are within walking distance of moderate-income census tracts and are easily accessible to pedestrians. Another branch borders a low-income tract and is easily accessible to pedestrians. Competition for deposits is strong in the Santa Fe market.

Just over half (51 percent) of all FNBSF's deposits are within the Santa Fe AA. It also accounts for 32 percent of all residential mortgage and small business loans made in FNBSF's AAs in 2014 and 2015. Eleven institutions compete for deposits in the Santa Fe AA and FNBSF controls 21.3 percent of the market share, only behind a very large national bank. Competitors include large and small national banks, as well as state institutions.

Santa Fe is the capital of New Mexico. The primary employment base is state and local government and includes the State of New Mexico, City of Santa Fe, and Santa Fe Community College. The largest employer in the educational and health services sector is Christus St. Vincent Regional Medical Center. As of 2015, the unemployment rate for the Santa Fe MSA was 3.56 percent, below the national average of 5 percent. The 2015 HUD-adjusted median family income in the MSA was \$65,300; however, 13 percent of households live below the poverty level.

The shortage of affordable housing continues to be a significant challenge in the AA. The median housing value based on the 2010 census date was \$337,000. With 13 percent of households in Santa Fe living below the poverty and nearly 40 percent of the population characterized as LMI, it is unlikely that this demographic could afford a traditional mortgage on the median home price.

There are numerous CD organizations which provide community development opportunities. Those organizations provide affordable housing and community services to LMI individuals, economic development activities, revitalization of LMI areas, and small business financial and economic support in Santa Fe County. This provides financial institutions with ample opportunities to provide qualified CD loans, investments, and services.

We completed one community contact in the Santa Fe AA for this examination. This organization provides education, personal support, and assistance to individuals to find affordable common sense lending. The organization noted that housing costs in Santa Fe are high relative to incomes for a majority of Santa Fe residents, making home-ownership a challenge. Approximately 50 percent of the people who work in Santa Fe live somewhere else. However, it was felt that there was no shortage of mortgage lending from financial institutions.

## State of Colorado

### Denver-Aurora-Lakewood MSA

Demographic Information for Full-Scope Area: Denver-Aurora-Lakewood MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	621	11.11	22.54	33.49	31.72	1.13
Population by Geography	2,543,482	11.14	23.08	33.37	32.36	0.04
Owner-Occupied Housing by Geography	650,428	6.31	19.13	36.08	38.48	0.00
Businesses by Geography	287,922	8.26	20.01	31.01	40.40	0.32
Farms by Geography	5,606	6.65	17.62	35.89	39.76	0.07
Family Distribution by Income Level	620,203	21.90	17.14	20.30	40.66	0.00
Distribution of Low- and Moderate- Income Families throughout AA Geographies	242,175	19.33	34.13	30.34	16.20	0.00
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below the Poverty Level	= \$75,101 = \$76,700 = 11%	Median Housing Value Unemployment Rate				= \$266,191 = 3.72%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2015 HUD updated MFI.

The Denver-Aurora-Lakewood MSA is the 19<sup>th</sup> largest MSA in the United States with a population of \$2.5 million as of 2015. This represents over half of Colorado's population. The Denver-Aurora-Lakewood MSA covers ten counties, including Adams, Arapahoe, Aurora, Broomfield, Clear Creek, Denver, Douglas, Gilpin, Jefferson, and Park. The bank has designated all ten counties as their AA.

There are three branches located in the Denver AA. One branch is located in a moderate-income tract, while two branches are located in upper income tracts. Both branches located in upper income CTs are within a half-mile radius of moderate income tracts. All three branches have ATMs. The Denver AA accounts for 23 percent of all the residential mortgage loans and small business loans made in the FNBSF AAs in 2014 and 2015. The AA also contributes 15 percent of all FNBSF's deposits. There are 145 institutions with almost 1,543 branches. FNBSF's deposit share ranks 32<sup>nd</sup>, with a deposit share of 0.38 percent. Competition includes several large national banks and smaller state and national banks.

As of 2015, the unemployment rate for the Denver AA was 3.72 percent, below the national average of 5 percent. Strong industries in this market include health care, telecommunications, and high-technology manufacturing. Some of the largest employers in this market include Health One, LLC., Century-Link, Inc., and Lockheed Martin Corporations. The 2015 HUD-adjusted median family income in the AA was \$76,700 and the households living below the poverty line totaled 11 percent.

Affordable housing is a significant challenge in the AA. Given that a low- income family within the bank's AA produces under \$40,000 dollars in annual income and the median home price during the

assessment period is \$266,000, RRE lending opportunities to low- income families are limited. Significant population growth within the Denver AA during the assessment period further compounded this issue, as housing demand exceeded supply, driving up both prices and competition for lower-priced units. A recent local news article asserted a buyer of a median-priced home in metro Denver (\$354,000 in the fourth quarter of 2015) needs to make a salary of \$68,436 a year to qualify with a 20 percent down payment on a 30-year mortgage. For buyers who put down only 10 percent, the required income jumps to \$80,712. The article further states that due to income and down payment requirements, low-income borrowers tend to gravitate towards rental units (*Denver Post, 2015*).

There are numerous CD organizations which provide community development opportunities. Those organizations provide affordable housing and community services to LMI individuals, economic development activities, revitalization of LMI, and small business financial and economic support in the Denver AA. This provides financial institutions with ample opportunities to provide qualified CD loans, investments, and services.

OCC examiners conducted a community contact interview with an organization that provides housing assistance to LMI households. The contact stated they had a neutral perception of area financial institutions. The community contact stated that there are opportunities for financial institutions to better serve the LMI community through apartment development projects, improved and simplified communication to LMI households, and assistance with financial education to LMI communities.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased 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. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 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, if applicable, 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.

## **Tables of Performance Data**

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### **State of New Mexico**

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW MEXICO												
Evaluation Period: JANUARY 01, 2014 TO DECEMBER 31, 2015												
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)	
<b>Full Review:</b>												
Albuquerque, NM AA	34.14	83	21,123	58	20,421	0	0	2	5,501	141	41,544	13.04
Santa Fe, NM MSA	46.73	79	26,304	114	19,877	0	0	2	6,969	193	46,191	73.65
<b>Limited Review:</b>												
Las Cruces, NM MSA	16.22	8	760	58	11,175	1	125	0	0	67	12,060	8.06
Los Alamos, NM AA	2.91	12	1,335	0	0	0	0	0	0	12	1,335	5.26

\* Loan Data as of December 31, 2015. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is March 31, 2013 to March 31, 2016.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
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)	
<b>Full Review:</b>														
Albuquerque, NM AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	13.04
Santa Fe, NM MSA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	73.65
<b>Limited Review:</b>														
Las Cruces, NM MSA	100.00	5	1,125	5	1,125	0	0	0	0	0	0	0	0	8.06
Los Alamos, NM AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	5.26

\* Loan Data as of December 31, 2015. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is From January 1, 2014 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NEW MEXICO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Albuquerque, NM AA	0	0	0	0	0
Santa Fe, NM MSA	0	0	0	0	0
<b>Limited Review:</b>					
Las Cruces, NM MSA	0	0	0	0	0
Las Alamos, NM AA	0	0	0	0	0

(\*)The evaluation period for Optional Product Line(s) is from January 1, 2014 to December 31, 2015.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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						
<b>Full Review:</b>																
Albuquerque, NM AA	58	52.73	2.68	3.45	27.57	20.69	32.77	17.24	36.98	58.62	0.49	0.48	0.48	0.28	0.66	
Santa Fe, NM MSA	46	41.82	3.42	0.00	20.89	4.35	34.30	23.91	41.40	71.74	1.90	0.00	0.53	1.48	2.47	
<b>Limited Review:</b>																
Las Cruces, NM MSA	3	2.73	4.58	0.00	31.65	33.33	18.07	0.00	45.70	66.67	0.12	0.00	0.32	0.00	0.12	
Los Alamos, NM AA	3	2.73	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	0.39	0.00	0.00	0.00	0.39	

\* Based on 2014 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: NEW MEXICO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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			
<b>Full Review:</b>																		
Albuquerque, NM AA	3	15.79	2.68	0.00	27.57	0.00	32.77	0.00	36.98	100.00	0.25	0.00	0.00	0.00	0.68			
Santa Fe, NM MSA	9	47.37	3.42	0.00	20.89	22.22	34.30	33.33	41.40	44.44	3.60	0.00	11.11	2.50	3.51			
<b>Limited Review:</b>																		
Las Cruces, NM MSA	2	10.53	4.58	0.00	31.65	0.00	18.07	0.00	45.70	100.00	0.35	0.00	0.00	0.00	0.63			
Los Alamos, NM AA	5	26.32	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	9.09	0.00	0.00	0.00	9.09			

\* Based on 2014 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: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					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						
<b>Full Review:</b>																
Albuquerque, NM AA	22	41.51	2.68	4.55	27.57	9.09	32.77	13.64	36.98	72.73	0.18	0.53	0.07	0.09	0.31	
Santa Fe, NM MSA	24	45.28	3.42	4.17	20.89	0.00	34.30	8.33	41.40	87.50	1.03	2.86	0.00	0.00	2.00	
<b>Limited Review:</b>																
Las Cruces, NM MSA	3	5.66	4.58	0.00	31.65	0.00	18.07	33.33	45.70	66.67	0.14	0.00	0.00	0.41	0.11	
Los Alamos, NM AA	4	7.55	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	2.05	0.00	0.00	0.00	2.05	

\* Based on 2014 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: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
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						
<b>Full Review:</b>																
Albuquerque, NM AA	0	0.00	14.00	0.00	34.63	0.00	33.29	0.00	18.08	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Fe, NM MSA	0	0.00	17.98	0.00	23.68	0.00	48.09	0.00	10.25	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Las Cruces, NM MSA	0	0.00	24.48	0.00	18.86	0.00	6.88	0.00	49.79	0.00	0.00	0.00	0.00	0.00	0.00	
Los Alamos, NM AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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: NEW MEXICO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015		
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	
<b>Full Review:</b>																
Albuquerque, NM AA	58	25.22	7.30	13.79	27.84	55.17	32.81	8.62	32.05	22.41	0.32	0.53	0.66	0.10	0.23	
Santa Fe, NM MSA	114	49.57	9.26	5.26	10.99	3.51	41.80	55.26	37.88	35.96	2.05	1.37	0.61	3.14	1.69	
<b>Limited Review:</b>																
Las Cruces, NM MSA	58	25.22	8.88	6.90	26.68	27.59	18.07	17.24	46.37	48.28	1.60	1.92	1.93	0.93	1.75	
Los Alamos, NM AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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 2015.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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					
<b>Full Review:</b>																				
Albuquerque NM, AA	0	0.00	4.71	0.00	25.77	0.00	34.20	0.00	35.32	0.00	0.00	0.00	0.00	0.00	0.00					
Santa Fe, NM MSA	0	0.00	4.66	0.00	12.33	0.00	35.07	0.00	47.95	0.00	0.00	0.00	0.00	0.00	0.00					
<b>Limited Review:</b>																				
Las Cruces, NM MSA	1	100.00	4.00	0.00	43.53	0.00	13.18	100.00	39.29	0.00	0.00	0.00	0.00	0.00	0.00					
Los Alamos, NM AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00					

\* Based on 2014 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 2015.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Albuquerque, NM AA	58	52.73	22.36	3.45	17.46	10.34	18.92	18.97	41.27	67.24	0.58	0.25	0.21	0.40	0.85	
Santa Fe, NM MSA	46	41.82	23.60	6.52	16.10	8.70	18.88	26.09	41.42	58.70	2.11	2.13	0.46	3.94	1.93	
<b>Limited Review:</b>																
Las Cruces, NM MSA	3	2.73	25.10	0.00	16.55	33.33	16.27	0.00	42.09	66.67	0.15	0.00	0.35	0.00	0.16	
Los Alamos, NM AA	3	2.73	1.98	0.00	2.52	33.33	8.56	0.00	86.95	66.67	0.42	0.00	0.00	0.00	0.47	

\* Based on 2014 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 0.0 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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****						
<b>Full Review:</b>																
Albuquerque, NM AA	3	15.79	22.36	0.00	17.46	33.33	18.92	0.00	41.27	66.67	0.26	0.00	0.00	0.00	0.51	
Santa Fe, NM MSA	9	47.37	23.60	12.50	16.10	25.00	18.88	37.50	41.42	25.00	3.64	10.00	0.00	9.09	1.59	
<b>Limited Review:</b>																
Las Cruces, NM MSA	2	10.53	25.10	0.00	16.55	0.00	16.27	0.00	42.09	100.00	0.36	0.00	0.00	0.00	0.54	
Los Alamos, NM AA	5	26.32	1.98	0.00	2.52	0.00	8.56	20.00	86.95	80.00	9.09	0.00	0.00	100.00	0.00	

\* Based on 2014 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 5.3% 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: NEW MEXICO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Mortgage Refinance 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****						
<b>Full Review:</b>																
Albuquerque, NM AA	22	41.51	22.36	0.00	17.46	0.00	18.92	4.55	41.27	95.45	0.23	0.00	0.00	0.08	0.41	
Santa Fe, NM MSA	24	45.28	23.60	0.00	16.10	8.70	18.88	13.04	41.42	78.26	1.20	0.00	0.48	0.96	1.77	
<b>Limited Review:</b>																
Las Cruces, NM MSA	3	5.66	25.10	0.00	16.55	0.00	16.27	33.33	42.09	66.67	0.19	0.00	0.00	0.00	0.28	
Los Alamos, NM AA	4	7.55	1.98	25.00	2.52	0.00	8.56	50.00	86.95	25.00	2.26	0.00	0.00	20.00	0.84	

\* Based on 2014 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 1.9 percent 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: NEW MEXICO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015	
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
<b>Full Review:</b>									
Albuquerque NM, AA	58	25.22	77.86	41.38	24.14	27.59	48.28	0.32	0.29
Santa Fe, NM MSA	114	49.57	80.06	50.88	59.65	21.05	19.30	2.05	2.13
<b>Limited Review:</b>									
Las Cruces, NM MSA	58	25.22	76.14	53.45	46.55	32.76	20.69	1.60	1.51
Los Alamos, NM AA	0	0.00	81.90	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 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-2015).

\*\*\*\* 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 6.96 percent 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: NEW MEXICO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Albuquerque, NM AA	0	0.00	95.42	0.00	0.00	0.00	0.00	0.00	0.00
Santa Fe, NM MSA	0	0.00	98.08	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Las Cruces, NM MSA	1	100.00	90.82	100.00	0.00	100.00	0.00	0.00	0.00
Los Alamos, NM AA	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 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 - 2015).

\*\*\*\* 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 0.00 percent of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW MEXICO				Evaluation Period: MARCH 31, 2013 TO MARCH 31, 2016			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Albuquerque, NM AA	0	0	7	3,871	7	3,871	62.52	0	0
Santa Fe, NM MSA	3	1,500	15	333	18	1,833	29.60	0	0
<b>Limited Review:</b>									
Las Cruces, NM MSA	0	0	3	370	3	370	5.97	0	0
Los Alamos, NM AA	0	0	1	1	1	1	0.02	0	0
<b>Statewide and Regional</b>									
Statewide with Benefit to AA	1	53	7	51	8	104	1.68	0	0
Regional with Benefit to AA	0	0	1	13	1	13	0.21	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: NEW MEXICO Evaluation Period: MARCH 31, 2013 TO MARCH 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
<b>Full Review:</b>																	
Albuquerque, NM AA	13.04	3	21.43	0.00	33.3	66.7	0.00	1	1	0	-1	+1	0	5.57	32.22	30.91	31.30
Santa Fe, NM MSA	73.65	7	50.00	0.00	0.00	57.14	42.86	0	0	0	0	0	0	5.94	23.86	35.11	34.44
<b>Limited Review:</b>																	
Las Cruces, NM MSA	8.06	3	21.43	0.00	33.3	66.7	0.00	0	0	0	0	0	0	9.56	34.48	18.17	37.79
Los Alamos, NM AA	5.26	1	7.14	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	0.00	0.00	100.0

## Tables of Performance Data

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### State of Colorado

Table 1. Lending Volume

LENDING VOLUME												
Geography: COLORADO												
Evaluation Period: JANUARY 01, 2014 TO DECEMBER 31, 2015												
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)	
<b>Full Review:</b>												
Denver-Aurora-Lakewood, CO MSA	70.50	13	17,630	125	40,497	3	297	14	51,994	141	58,424	65.27
<b>Limited Review:</b>												
Boulder, CO MSA	19.50	8	29,197	31	12,355	0	0	2	4,217	39	41,552	26.02
Fort Collins, CO MSA	8.00	0	0	16	4,545	0	0	1	2,587	16	4,545	4.11
Lincoln County, CO AA	2.00	0	0	0	0	4	548	0	0	4	548	4.60

\* Loan Data as of December 31, 2015. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is March 31, 2013 to March 31, 2016.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: COLORADO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
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)	
<b>Full Review:</b>														
Denver-Aurora-Lakewood, CO MSA	70.00	7	2,574	7	2,574	0	0	0	0	0	0	0	0	65.27
<b>Limited Review:</b>														
Boulder, CO MSA	10.00	1	250	1	250	0	0	0	0	0	0	0	0	26.02
Fort Collins, CO MSA	20.00	2	416	2	416	0	0	0	0	0	0	0	0	4.11
Lincoln County, CO AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.60

\* Loan Data as of December 31, 2015. Rated area refers to either the state or multi-state MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is From January 1, 2014 to December 31, 2015.  
 \*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: COLORADO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Denver-Aurora-Lakewood, CO MSA	0	0	0	0	0
<b>Limited Review:</b>					
Boulder, CO MSA	0	0	0	0	0
Fort Collins, CO MSA	0	0	0	0	0
Lincoln County, CO AA	0	0	0	0	0

(\*)The evaluation period for Optional Product Line(s) is from January 1, 2014 to December 31, 2015.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: COLORADO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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						
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	7	87.50	6.31	0.00	19.13	14.29	36.08	0.00	38.48	85.71	0.00	0.00	0.00	0.00	0.01	
<b>Limited Review:</b>																
Boulder, CO MSA	1	12.50	2.83	0.00	14.95	100.00	45.76	0.00	36.45	0.00	0.02	0.00	0.10	0.00	0.00	
Fort Collins, CO MSA	0	0.00	1.01	0.00	18.16	0.00	50.04	0.00	30.79	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement 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						
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	0	0.00	6.31	0.00	19.13	0.00	36.08	0.00	38.48	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Boulder, CO MSA	1	100.00	2.83	0.00	14.95	0.00	45.76	100.00	36.45	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Collins, CO MSA	0	0.00	1.01	0.00	18.16	0.00	50.04	0.00	30.79	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					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						
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	5	55.56	6.31	40.00	19.13	0.00	36.08	20.00	38.48	40.00	0.01	0.09	0.00	0.01	0.01	
<b>Limited Review:</b>																
Boulder, CO MSA	4	44.44	2.83	0.00	14.95	0.00	45.76	100.00	36.45	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Collins, CO MSA	0	0.00	1.01	0.00	18.16	0.00	50.04	0.00	30.79	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
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						
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	1	33.33	20.60	0.00	32.05	0.00	32.72	100.00	14.63	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Boulder, CO MSA	2	66.67	8.66	0.00	30.19	0.00	46.97	100.00	14.18	0.00	3.45	0.00	0.00	14.29	0.00	
Fort Collins, CO MSA	0	0.00	8.14	0.00	34.63	0.00	44.95	0.00	12.28	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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: COLORADO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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			
<b>Full Review:</b>																		
Denver-Aurora-Lakewood, CO MSA	122	72.19	8.26	16.39	20.01	31.97	31.01	24.59	40.40	27.05	0.07	0.11	0.04	0.10	0.05			
<b>Limited Review:</b>																		
Boulder, CO MSA	31	18.34	3.80	3.23	22.21	25.81	42.36	38.71	31.63	32.26	0.14	0.30	0.22	0.16	0.06			
Fort Collins, CO MSA	16	9.47	0.97	0.00	20.68	56.25	49.43	43.75	28.91	0.00	0.06	0.00	0.06	0.10	0.00			
Lincoln County, CO AA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			

\* Based on 2014 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 2015.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					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						
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	3	42.86	6.65	0.00	17.62	0.00	35.89	100.00	39.76	0.00	0.59	0.00	0.00	1.34	0.00	
<b>Limited Review:</b>																
Boulder, CO MSA	0	0.00	3.73	0.00	16.19	0.00	47.92	0.00	32.16	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Collins, CO MSA	0	0.00	1.01	0.00	16.87	0.00	48.21	0.00	33.75	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	4	57.14	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.56	0.00	0.00	5.56	0.00	

\* Based on 2014 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
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****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	7	87.50	21.90	0.00	17.14	0.00	20.30	14.29	40.66	85.71	0.01	0.00	0.00	0.01	0.01	
<b>Limited Review:</b>																
Boulder, CO MSA	1	12.50	22.09	0.00	16.59	0.00	20.06	0.00	41.26	100.00	0.02	0.00	0.00	0.00	0.04	
Fort Collins, CO MSA	0	0.00	20.17	0.00	17.62	0.00	22.26	0.00	39.94	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	0	0.00	20.70	0.00	21.19	0.00	20.21	0.00	37.89	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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 0.0 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: COLORADO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Lakewood, CO MSA	0	0.00	21.90	0.00	17.14	0.00	20.30	0.00	40.66	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Boulder, CO MSA	1	100.00	22.09	0.00	16.59	0.00	20.06	0.00	41.26	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Collins, CO MSA	0	0.00	20.17	0.00	17.62	0.00	22.26	0.00	39.94	0.00	0.00	0.00	0.00	0.00	0.00	
Lincoln County, CO AA	0	0.00	20.70	0.00	21.19	0.00	20.21	0.00	37.89	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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 100 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: COLORADO		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015											
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****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Lakewood, CO MSA	5	55.56	21.90	0.00	17.14	0.00	20.30	0.00	40.66	100.00	0.01	0.00	0.00	0.00	0.02
<b>Limited Review:</b>															
Boulder, CO MSA	4	44.44	22.09	0.00	16.59	0.00	20.06	0.00	41.26	100.00	0.00	0.00	0.00	0.00	0.00
Fort Collins, CO MSA	0	0.00	20.17	0.00	17.62	0.00	22.26	0.00	39.94	0.00	0.00	0.00	0.00	0.00	0.00
Lincoln County, CO AA	0	0.00	20.70	0.00	21.19	0.00	20.21	0.00	37.89	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 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 55.6 percent 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: COLORADO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015		
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	
<b>Full Review:</b>										
Denver-Aurora-Lakewood, CO MSA	125	72.67	80.82	32.80	24.00	30.40	45.60	0.07	0.08	
<b>Limited Review:</b>										
Boulder, CO MSA	31	18.02	81.48	41.94	29.03	16.13	54.84	0.14	0.14	
Fort Collins, CO MSA	16	9.30	82.84	25.00	6.25	56.25	37.50	0.06	0.13	
Lincoln County, CO AA	0	0.00	71.67	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2014 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-2015).

\*\*\*\* 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 4.65 percent 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: COLORADO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
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
<b>Full Review:</b>									
Denver-Aurora-Lakewood, CO MSA	3	42.86	95.75	100.00	100.00	0.00	0.00	0.59	1.09
<b>Limited Review:</b>									
Boulder, CO MSA	0	0.00	96.38	0.00	0.00	0.00	0.00	0.00	0.00
Fort Collins, CO MSA	0	0.00	97.28	0.00	0.00	0.00	0.00	0.00	0.00
Lincoln County, CO AA	4	57.14	99.37	100.00	50.00	50.00	0.00	5.56	20.00

\* Based on 2014 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 - 2015).

\*\*\*\* 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 0.00 percent of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO		Evaluation Period: MARCH 31, 2013 TO MARCH 31, 2016					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Denver-Aurora-Lakewood, CO MSA	0	0	11	5,112	11	5,112	59.29	0	0
<b>Limited Review:</b>									
Boulder, CO MSA	0	0	6	1,693	6	1,693	19.64	0	0
Fort Collins, CO MSA	0	0	4	1,701	4	1,701	19.73	0	0
Lincoln County, CO AA	0	0	0	0	0	0	0.00	0	0
<b>Statewide and Regional</b>									
Statewide with Benefit to AA	1	100	1	3	2	103	1.19	0	0
Regional with Benefit to AA	0	0	1	13	1	13	0.15	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: COLORADO Evaluation Period: March 31, 2013 to MARCH31, 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
<b>Full Review:</b>																	
Denver-Aurora-Lakewood, CO MSA	65.27	3	42.86	0.00	33.3	00.0	66.7	0	6	0	0	-2	-4	11.14	23.08	33.37	32.36
<b>Limited Review:</b>																	
Boulder, CO MSA	26.02	3	42.86	0.00	66.7	33.3	0.00	0	0	0	0	0	0	6.89	18.39	45.80	28.91
Fort Collins, CO MSA	4.11	1	14.29	0.00	0.00	100.0	0.00	0	0	0	0	0	0	2.64	22.37	48.27	26.69
Lincoln County, CO AA	4.60	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	-1	0	0.00	0.00	100.0	0.00

