



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Santa Fe
Charter Number 1750

62 Lincoln Avenue
Santa Fe, NM 87504

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**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	First National Bank of Santa Fe Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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:

- FNBSF’s volume of lending and the percentage of loans made in the assessment areas (AA) are adequate.
- Borrower and geographic distribution for HMDA loans in the Santa Fe AA are adequate. Analyses of the home mortgage loans in the Denver AA are not meaningful due to the low volume.
- Borrower distribution for small business lending is good in the AAs receiving full-scope reviews. Geographic distribution for small business loans is poor in the Santa Fe AA and excellent in the Denver AA.
- FNBSF’s community development (CD) lending in the state of New Mexico had a positive impact on the state’s Lending Test rating. CD lending in the state of Colorado had a positive impact on the state’s Lending Test rating.
- The volume of FNBSF’s qualified investments is adequate in relation to the investment opportunities and identified needs in the bank’s AAs.
- 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 Santa Fe AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multi-family 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 multi-family (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

Multi-family: 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, headquartered in Santa Fe, New Mexico, was chartered in 1870 and is the oldest bank in the Southwest. FNBSF is a wholly owned subsidiary of New Mexico Banquest Corporation, a one-bank holding company also headquartered in Santa Fe, New Mexico. NMBC also owns an insurance company and a 50% stake in an investment advisory firm. As of September 30, 2012, FNBSF had total assets of \$765 million, net loans of \$344 million, and Tier One Capital of \$79.6 million.

FNBSF is an interstate bank with operations centered primarily in the state of New Mexico. FNBSF has a main office and six physical branches in Santa Fe, New Mexico, two offices in Albuquerque, New Mexico, and one branch in Los Alamos, New Mexico. FNBSF also has a full service branch in Denver, Colorado that was opened in 2008, and relocated in March 2010. Although all FNBSF branches are located in middle- and upper-income CTs, management provided us with additional information proving the majority of the branches to be readily accessible to adjacent or near to low- or moderate-income CTs. In addition to the full service branches, FNBSF has one mobile office which provides alternative delivery services in Santa Fe, Los Alamos, Rio Arriba, Taos, San Miguel, and Sandoval Counties. As of our examination, the sole mobile branch was primarily located in a high-end retirement community.

FNBSF is a strong commercial and residential real estate lender. The composition of the loan portfolio includes: commercial real estate loans, 52%; residential loans, 29%; construction and development loans, 7%; commercial loans, 7%; and individual loans, 1%. During the evaluation period, FNBSF sold \$89.5 million in residential mortgages to the secondary market.

FNBSF's primary deposit market, the Santa Fe MSA, is very competitive. FNBSF is one of five financial institutions that control roughly 85% of the deposit market share in the Santa Fe MSA. Two of these institutions are branches of large national banks, one is a state bank, and the other is the largest independent community bank operating solely in New Mexico. The Los Alamos, Albuquerque and Denver markets are competitive as well; however, FNBSF holds a significantly smaller deposit share in these markets because of its limited operations in these locations.

FNBSF's lending markets are also very competitive. In the Santa Fe AA, FNBSF is one of 218 HMDA reporting lenders and has a 1.8% market share of reported home mortgage loans. FNBSF is also one of 44 CRA reporting small business lenders in the AA. FNBSF has a 2.4% market share of reported small business loans. In the Denver AA, FNBSF is one of 562 HMDA reporting lenders and has a 0.01% market share of reported mortgage loans, although HMDA lending is not a primary focus for the bank in the Denver marketplace. FNBSF is one of 143 CRA reporting small business lenders in the Denver AA and has a 0.02% market share of reported small business loans. FNBSF market share in the Albuquerque and Los Alamos AAs for HMDA and CRA reported data is consistent or lower than the Santa Fe and Denver markets.

FNBSF was subject to a formal enforcement action, which placed certain restrictions on its loan portfolio. These restrictions took effect on January 29, 2010, and were terminated on July 11, 2012. FNBSF previously received a CRA rating of "Satisfactory" on February 28, 2009, when it was evaluated as a Large Bank.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses information since the previous examination dated February 28, 2009. 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 February 28, 2009, to December 10, 2012. The evaluation period for our review of FNBSF's home mortgage and small business loan originations (HMDA and CRA data) covers January 1, 2009, through December 31, 2011. Mortgage loans reviewed were home purchase, home improvement, and home refinance loans. Multi-family loans were not a primary product and were not evaluated. Given changes resulting from the 2010 Census that impact HMDA and CRA data analysis beginning with 2012 data, we excluded 2012 data from our analysis. This approach was reasonable based on the bank's activity. Management concurred with the exclusion. Small farm loans were not a primary product and were not evaluated.

Data Integrity

We determined the accuracy of the data used for the evaluation through a series of data integrity tests. Our first test identified issues with data integrity for 2009 and 2010 small business loan originations. The 2009 data reported for small business loan originations showed an error rate greater than 5% in a key field. In response, management reviewed and corrected the 2009 and 2010 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 state ratings. The rating methodology is structured such that the Lending Test is weighted most heavily on the three tests. For FNBSF, lending activity in New Mexico, mainly the Santa Fe AA, was considered more in determining the overall rating due to the percentage of deposits in each of the New Mexico AAs. Lending activities in Colorado were centered in the Denver AA and represented a very small portion of the overall lending activity and deposit base.

To conclude on FNBSF's overall record of performance, we assessed activities in the AAs under the Lending, Investment and Services Tests. Based on the portion of reported lending during the evaluation period, geographic distribution and borrower distribution products are weighted as follows: 53% HMDA and 47% small loans to business. Home purchase, home

improvement, and home mortgage refinance products were weighted considering volume, and where appropriate, the absence of activity as indicated by the market share. CD lending, when considered, enhanced Lending Test conclusions.

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.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), or 12 C.F.R. § 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 assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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

State Rating

State of New Mexico

CRA Rating for New Mexico: Satisfactory

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

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

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

The major factors that support this rating include:

- FNBSF's lending activity in the Santa Fe AA is adequate. Borrower and geographic distribution for HMDA loans in the AA is adequate. Borrower distribution for small business lending in the AA is good. Geographic distribution for small business loans is poor.
- FNBSF's CD lending in the state of New Mexico had a positive impact on the Lending Test rating.
- The volume of FNBSF's qualified investments is adequate in relation to the investment opportunities and is responsive to identified needs in the Santa Fe AA.
- 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 Santa Fe AA.

Description of Institution's Operations in New Mexico

FNBSF's operations are primarily within the state of New Mexico. Total statewide deposits of \$666 million represent 99% of FNBSF's total deposits. Total loans within the state represent 89% of FNBSF's loan portfolio. FNBSF operates in three designated AAs in New Mexico with the Santa Fe MSA representing the largest portion of deposits and loans. The bank has also identified the Albuquerque MSA and Los Alamos County as AAs. FNBSF's 20.98% deposit market share represents the most significant market share amongst the 11 institutions operating in the Santa Fe MSA. FNBSF's deposit market share is much smaller in the Los Alamos and Albuquerque 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 performed a full-scope review for the Santa Fe AA, which represents the majority of lending and deposits for the institution within the state. We performed limited-scope reviews for the Albuquerque AA and Los Alamos AA. See Appendix A for more detailed market profile of the Santa Fe AA.

The New Mexico State Rating is most heavily weighted on the Lending Test performance in the Santa Fe AA. FNBSF's percentage of deposits and lending activity are most prevalent in the Santa Fe AA.

We discussed the credit needs of the Santa Fe MSA and financial institution's responsiveness to these needs with the Executive Director of a local non-profit CD financial institution (CDFI). The Executive Director discussed the continued need for affordable housing targeted at low- and moderate-income families. As a result, we gave additional consideration to CD loans, investments, and services that met the need for affordable housing in the Santa Fe MSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test for the state of New Mexico is rated "Low Satisfactory." Based on our full-scope review, performance in the Santa Fe AA is adequate.

Lending Activity

The bank's overall lending in the state of New Mexico is adequate. This is primarily based on the bank's performance in the Santa Fe AA. In reaching this conclusion, we considered the strong competition from other lenders and overall weak economic conditions during the evaluation period.

Refer to Table 1 Lending Volume and Other Products 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 Santa Fe AA is adequate. As of June 30, 2012, FNBSF reported 20.98% market share of deposits. Nevertheless, the bank's market share of small business loans by number is 3.39%, which is significantly lower than its deposit market share. When combined with HMDA lending, FNBSF's market share by number of loans is 2.44% of the total number of loans originated in this AA, which is significantly lower than its deposit market share. The bank's market share of 13.87% by dollar volume of small business loans was positively considered with respect to performance in this AA.

An analysis of multi-family loans is not meaningful because only one multi-family loan was originated in the AA during the evaluation period. FNBSF reported no small loans to farms during the evaluation period.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of the bank's lending is adequate.

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is adequate.

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 home mortgage loan originations/purchases.

FNBSF's geographic distribution of home purchase loans within the Santa Fe AA is adequate. The single low-income CT in the Santa Fe AA is located near the central business district in downtown Santa Fe. Residential mortgage loans continue to be difficult to originate because only 0.84% of owner occupied housing is geographically located in this CT. FNBSF's lending to the sole low-income geography exceeds the percentage of owner occupied housing units and its overall market share. However, FNBSF's loans to moderate-income geographies are significantly lower than the percentage of owner occupied housing units in these geographies. The bank's market share of loans in moderate-income geographies is significantly below its overall market share.

FNBSF's geographic distribution of home improvement loans within the Santa Fe AA is good. The portion of FNBSF's home improvement loans in the sole low-income CT exceeds the percentage of owner occupied units. Home improvement loans in moderate-income geographies are significantly lower than the percentage of owner occupied housing units in these geographies. However, FNBSF's market share of home improvement loans in low-income and moderate-income geographies exceeds its overall market share.

FNBSF's geographic distribution of home mortgage refinance loans within the Santa Fe AA is adequate. The portion of FNBSF's mortgage refinance loans in the low-income geography meets the 0.84% of owner occupied units in the AA. Lending opportunities are limited in the sole low-income CT. The portion of home mortgage refinance loans in the moderate-income CT is substantially below the percentage of owner occupied units in these geographies. This is also reflected in the bank's market share for low-income and moderate-income geographies which is below its overall market share.

Small Loans to Businesses

Overall, the geographic distribution of the bank's small loans to businesses is adequate.

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/purchase of small loans to businesses.

FNBSF's geographic distribution of small loans to businesses in the Santa Fe AA is adequate. Bank originated loans to small businesses in low-income geographies at 0.95% is lower than the 1.78% of businesses located in this tract. The percentage of small business loans originated in moderate-income geographies at 8.98% is significantly lower than the 17.57% of small businesses located in moderate-income CTs. At 3.23%, the bank is near to the overall market share in the low-income tract. At 1.13%, the bank's market share in moderate-income geographies is lower than its overall market share.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed FNBSF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic

distribution of loans. Our review did not reveal any conspicuous lending gaps within the Santa Fe AA.

Inside/Outside Ratio

This ratio is a bank-wide ratio and not calculated by individual AA. Analysis is limited to bank originations and purchases and does not include any affiliate data. For the evaluation period, a high percentage of FNBSF's loans were made inside its designated AAs. Specifically, 91.8% of home mortgage loans by number and 95.7% of small business loans by number were made inside of the bank's designated AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of the bank's lending is adequate. We considered the disparity between home prices and median household income in our analysis. We also considered the limited lending opportunities for the institution given its conventional mortgage products and local competition.

Home Mortgage Loans

The overall borrower distribution of home mortgage lending is adequate.

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 home mortgage loan originations and purchases.

Borrower distribution of home purchase loans in the Santa Fe AA is poor. We considered the disparity between housing prices and median incomes in this AA. FNBSF did not originate any loans to low-income borrowers during the evaluation period compared to 22.01% of low-income families in the AA. For moderate-income borrowers, the portion of bank-originated loans at 5.19% is significantly lower than the 17.85% of moderate-income borrowers within the Santa Fe AA. FNBSF's zero percent market share to low- and moderate-income borrowers is lower than its overall market share of 2.03%.

Borrower distribution of home improvement loans in the Santa Fe AA is adequate. The bank's portion of originated loans to low-income borrowers of 16.48% is lower than the demographic comparator of 22.01%. The bank's portion of home improvement loans to moderate-income borrowers of 13.19% is lower than the demographic comparator of 17.85%. FNBSF's market share of home improvement loans to low-income borrowers of 31.58% and 12.5% for moderate-income borrowers exceeds its overall market share of 24.67%.

Borrower distribution for home mortgage refinance loans in the Santa Fe AA is adequate. The portion of originated loans for home mortgage refinance of 2.58% is significantly lower than the 22.01% of low-income families in the AA. The portion of FNBSF's home mortgage refinance loans to moderate-income borrowers of 12.92% is somewhat lower than the demographic comparator of 17.85%. FNBSF's market share of home mortgage refinance loans is somewhat lower than its overall market share for low-income borrowers and near to its overall market share for moderate-income borrowers.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is good.

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 purchase of small loans to businesses.

FNBSF's distribution of loans to businesses with revenues of \$1 million or less in the Santa Fe AA is good. The portion of loans to small businesses with revenues under \$1 million of 55.56% is lower than the 66.63% of businesses of this type in the Santa Fe AA. FNBSF's market share of loans to small businesses exceeds its overall market share. Regarding loan size, 72.58% of originations were for loan size of less than \$100 thousand, 13.48% were for loan size of at least \$250 thousand but less than \$1 million, and 13.95% were for loan size of greater than \$1 million.

Community Development Lending

FNBSF's level of CD lending in the state of New Mexico had a positive impact on its overall lending performance. Total CD loans in the state of New Mexico represented 2.8% of allocated Tier One capital. The bank did not originate any CD loans in the Santa Fe AA or Albuquerque AA during the evaluation period. However, CD loans in the Los Alamos AA and the broader statewide area were viewed favorably. The qualifying CD loans include a multi-family loan for an apartment complex in the Los Alamos AA that provides low- and moderate-income individuals with affordable housing. The Los Alamos AA is comprised of four upper-income CTs. The broader statewide qualifying CD loan is for the construction of a dialysis center in Rio Arriba County, which is located in a designated distressed and underserved middle-income CT. We included the broader statewide CD lending activities in our analysis because FNBSF was deemed to have met the lending needs in the AAs identified in New Mexico.

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 CD lending. This table includes all CD loans, including multi-family 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, however, does not separately list CD loans.

Product Innovation and Flexibility

FNBSF had no innovative or flexible loan products to report.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Albuquerque AA and Los Alamos AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test in New Mexico. In the Albuquerque AA, the bank's performance is weaker than the bank's overall performance in the state. This is due to the bank's small business lending performance being lower than the demographic comparator for both borrower and geographic distribution. In the Los Alamos AA, the bank's performance

is not inconsistent than the bank's overall performance in the state. This is driven mainly by the bank's CD lending activity as the HMDA and Small Business lending opportunities are limited. Refer to the Tables 1 through 13 in the state of New Mexico section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New Mexico is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Santa Fe AA is adequate. In total, FNBSF invested \$1.74 million in its AAs in New Mexico, representing 2.25% of the bank's allocated Tier One Capital.

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

The volume and nature of qualified investments in the Santa Fe AA is adequate. CD investment opportunities in the AA are limited by the size and infrastructure of the community. During the evaluation period, FNBSF funded qualified investments totaling approximating \$769 thousand. The substantial majority of the qualified investments were to Homewise, which provides affordable housing and financial counseling to low- and moderate-income persons. This investment is responsive given that affordable housing is an identified need in the Santa Fe AA. FNBSF also made \$18,550 in charitable contributions to organizations that provide community services for low- and moderate-income persons including financial literacy classes, food banks, and shelters.

No investments were considered innovative or complex in our review of the institution's activity over the evaluation period. FNBSF relied mostly on existing investment conduits to support CD initiatives. Investments made prior to this period but still outstanding total \$866 thousand in the Santa Fe AA. This includes a security backed by mortgages to moderate-income borrowers in the Santa Fe AA totaling \$116 thousand and a \$750 thousand investment in Homewise.

FNBSF made qualified investments totaling \$101 thousand to entities that provide either regional or statewide benefit, including FNBSF's AAs. These investments funded entities that provide economic development by financing and providing technical assistance to small businesses. The regional and statewide investments had a neutral impact on the investment test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Los Alamos and Albuquerque AAs is weaker than the bank's overall performance under the investment test. No qualified investments were made in either the Albuquerque or Los Alamos AA. In Los Alamos, investment opportunities are somewhat limited by the demographics of the community. In Albuquerque, the bank has a far smaller market presence than it does in Santa Fe. Overall, however, the Santa Fe AA represents the majority of deposits and market activity

for the institution. Performance in the limited-scope areas did not impact the bank's Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in New Mexico is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Santa Fe 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.

FNBSF's delivery systems are reasonably accessible to essentially all portions of the bank's assessment area. No branches are located in low-income CTs but only 1.81% of low- and moderate-income families live in low-income tracts. No branches (0%) are located in moderate-income CTs which is lower than the 42.93% of low- and moderate-income families that live in moderate income CTs. However, four of the bank's eight branches are near to and within reasonable walking distance of nearby moderate-income CTs and are easily accessible to pedestrians. FNBSF is a member of the Allpoint ATM network. This network provides accountholders fee-free access to over 38,000 ATMs around the country, including numerous ATMs in the bank's AAs. These ATMs are located in convenient locations such as convenience and grocery stores. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

FNBSF offers a wide range of services that do not vary in a way that inconveniences its customers, including low- and moderate-income individuals. The products, services and business hours are reasonable, and bilingual service representatives are present at all offices. Alternative service delivery systems include internet and phone banking, as well as bill-payment services and these are available to all customers. Refer to FNBSF's CRA Public File for a current list of available products and services.

Community Development Services

FNBSF provides an adequate level of CD services. During the evaluation period, board members, bank officers and employees provided approximately 1,000 hours of technical assistance in financial matters to community organizations and programs in the Santa Fe AA. Services provided are not particularly innovative, but some are responsive to the AA need for affordable housing.

One example of CD services provided is a member of the Board of Directors and a senior officer participating on the loan committee of a non-profit economic development organization. This organization provides loans to small businesses that otherwise would not qualify for a business loan. In addition, the organization provides financial consultation services to small

businesses in New Mexico. This organization does not directly impact the Santa Fe AA, but it has the potential to benefit small businesses located in the AA.

Another example of CD services that addresses the need for affordable housing is FNBSF's participation in the Homebuyer Equity Leverage Partnership (HELP) and Special Needs Assistance Program (SNAP) from the Federal Home Loan Bank of Dallas (FHLBD). The HELP program offers grants totaling \$5 thousand for down payment and closing costs to qualifying first time low- and moderate-income homebuyers. SNAP provides grants totaling \$5 thousand for rehabilitation costs to qualifying low- and moderate-income special needs borrowers. FNBSF lending staff assists the borrower in applying for these funds. Under both of these programs, FNBSF has helped qualifying low- and moderate-income borrowers apply for \$108 thousand in grants during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Albuquerque AA is not inconsistent with the bank's overall performance in the state. The bank's performance under the service test in the Los Alamos AA is weaker than the bank's overall performance under the service test in New Mexico. FNBSF has one branch in the Los Alamos AA and the AA consists of only upper income geographies, so an analysis of branch distribution is not meaningful. No CD services were identified for the Los Alamos AA. The opportunity for qualified CD services in the Los Alamos AA is somewhat limited in comparison to FNBSF's other AAs; however, opportunities for CD services exist. Performance differences in limited-scope areas were not significant enough to impact the bank's overall rating.

Refer to Table 13 in the state of New Mexico section of Appendix D for the facts and data that support these conclusions.

State Rating

State of Colorado

CRA Rating for Colorado: Satisfactory

The lending test is rated: **Outstanding**

The investment test is rated: **Substantial Non-Compliance**

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 excellent responsiveness to the AAs credit needs.
- FNBSF's CD lending had a positive impact on the AA and was responsive to the identified credit needs of the area.
- FNBSF made no qualified CD investments in the state of Colorado during the evaluation period.
- FNBSF's retail branch provides reasonable access to individuals of all income levels. The institution provided no CD services within the state of Colorado during the evaluation period.

Description of Institution's Operations in Colorado

FNBSF's operations in the state of Colorado, centered in the Denver AA, are a relatively small part of its overall operations. FNBSF has one branch in the state and no ATMs, although the bank is part of a nationwide ATM network that is available to Colorado-based customers. As of June 30, 2012, FNBSF's deposit market share in the Denver AA is 0.01%. Lending in the Denver AA has been limited with 19 home mortgage loans and 33 small business loans reported during the evaluation period.

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 all the lending and deposits for the institution within the state. Management has not identified any additional AAs within the state of Colorado. The bank's identified Denver AA is exactly the same as the Denver-Aurora-Bloomfield MSA.

The Colorado State Rating is most heavily weighted on the Lending Test performance. Because Colorado deposits represent only a small percentage of FNBSF's total deposits, the performance in the state of Colorado is minimally weighted in the overall CRA rating for the institution.

We discussed the credit needs of the Denver AA and financial institutions' responsiveness to these needs with the President of a local non-profit CDFI. The President discussed the continued need for financial literacy training, affordable housing targeted at low- and moderate-income families, and small business lending. As a result, we gave additional weight to CD loans, investments, and services targeted at financial literacy, affordable housing, and small business economic development in the Denver MSA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test for the state of Colorado is rated "Outstanding." Based on our full-scope review, performance in the Denver AA is excellent. This is based primarily on the volume and nature of small business and CD lending.

Lending Activity

The bank's overall lending activity in the state of Colorado is adequate. This is based primarily on the bank's performance in the Denver AA. In reaching this conclusion, we considered the bank's minimal deposit market share and very small presence in the Denver AA and strong competition from other lenders.

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

FNBSF's lending activity in the Denver AA is adequate. As of June 30, 2012, FNBSF reported 0.01% market share of deposits. The bank's market share of small business loans is 0.20%, which exceeds its deposit market share. An analysis of home mortgage lending in the AA is not meaningful given the very low volume of activity. An analysis of multi-family loans is not meaningful because no multi-family loans were originated in the AA during the evaluation period. FNBSF reported no small loans to farms during the evaluation period.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans in the Denver AA is excellent. This is based primarily on the volume and nature of small business and CD lending.

Home Mortgage Loans

Overall, an analysis of the geographic distribution of home mortgage loans is not meaningful due to low volume of activity. FNBSF originated 19 HMDA reportable loans (including home purchase, home improvement, and refinance mortgage loans) in the Denver AA during the evaluation period. The volume is insufficient to perform a meaningful analysis of lending from a geographic distribution perspective. The limited HMDA lending is consistent with the bank's strategy for the Denver AA. The bank did not originate any multi-family loans or small farm loans in the AA during the evaluation period.

Refer to Tables 2, 3, 4, and 5 in the state of Colorado section of Appendix D for the facts and data used to make this determination.

Small Loans to Businesses

Overall, the geographic distribution of the bank's small loans to businesses is excellent.

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/purchase of small loans to businesses.

The geographic distribution of loans to small businesses in the Denver AA is excellent. During the evaluation period, FNBSF originated 33 small business loans in the Denver AA. The distribution of small business loans in low-income geographies exceeds the percentage of small businesses operating in those geographies. The distribution of small business loans in moderate-income geographies is near to the percentage of small businesses operating in those geographies. The bank's market share of small business loans in low- and moderate-income geographies exceeds its overall market share.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed FNBSF's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Our review did not reveal any conspicuous lending gaps within the Denver AA.

Inside/Outside Ratio

This ratio is a bank-wide ratio and not calculated by individual AA. Our analysis is limited to bank originations and purchases and does not include any affiliate data. For the evaluation period, a high percentage of FNBSF's loans were made inside its designated AAs. Specifically, 91.8% of home mortgage loans by number and 95.7% of small business loans by number were made inside of the bank's designated AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of the bank's lending is good.

Home Mortgage Loans

Overall, an analysis of the distribution of home mortgage loans by income of the borrower is not meaningful due to low volume of activity. The volume of originations is insufficient to perform a meaningful analysis of lending from a borrower distribution perspective. The limited HMDA lending is consistent with the bank's strategy for the Denver AA. The bank did not originate any multi-family loans or small farm loans in the AA during the evaluation period. The overall borrower distribution of home mortgage lending is adequate.

Refer to Tables 8, 9 and 10 in the state of New Mexico section of Appendix D for the facts and data used to make this determination.

Small Loans to Businesses

The overall borrower distribution of small loans to businesses is good.

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 purchase of small loans to businesses.

FNBSF's distribution of loans to businesses with revenues of \$1 million or less in the Denver AA is good. The portion of loans to small businesses with revenues under \$1 million of 54.55% is lower than the percentage of businesses of this type in the Denver AA. However, FNBSF's market share of loans to small businesses equals its overall market share. Regarding loan size, 36.36% of loans to small businesses were \$100 thousand or less, 39.39% were between \$100 thousand and \$250 thousand, and 24.24% were greater than \$1 million.

Community Development Lending

FNBSF's level of CD lending in Colorado had a positive impact on its overall lending performance. During the evaluation period, FNBSF originated a \$1.1 million CD loan in the Denver AA,, which represents 164% of allocated Tier One Capital. The borrower is a local nonprofit organization that focuses on providing affordable housing and community services to low- and moderate-income persons with a special focus on the homeless population. The loan is for a mixed-use residential/retail construction project located in a low-income geography. When complete, the project will provide 100 units of affordable housing for low-income persons along with retail space to complement the project and surrounding area.

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 CD lending. This table includes all CD loans, including multi-family 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.

Product Innovation and Flexibility

FNBSF had no innovative or flexible loan products to report.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Colorado is rated "Substantial Noncompliance." Based on a full-scope review, the bank's performance in the Denver AA is very poor.

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.

FNBSF made no qualified investments in the Denver AA. Although the institution's activities and market share in Denver are limited, there are significant opportunities for qualified investments. Our community contact in the Denver AA noted CD needs including affordable housing and community services targeted to low- and moderate-income persons such as financial literacy classes, and economic development. There are a number of organizations that target these needs in the Denver AA.

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

There are no branches in low- or moderate-income CTs (0%) which is lower than the percentage of people that reside in low- and moderate-income CTs. However, FNBSF's delivery systems are reasonably accessible to essentially all portions of the bank's assessment area. No branches are located in low- or moderate-income geographies. However, the bank's sole branch in the Denver AA is near to and within reasonable walking distance of nearby low- and moderate-income CTs and is easily accessible to pedestrians.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed one branch in a middle-income CT and opened its current branch in a middle-income CT. FNBSF is a member of the Allpoint ATM network. This network provides accountholders fee-free access to over 38,000 ATMs around the country, including numerous ATMs in the bank's AAs. These ATMs are located in convenient locations such as convenience and grocery stores.

FNBSF offers a wide range of services that do not vary in a way that inconveniences its customers, including low- and moderate-income individuals. The products, services and business hours are reasonable, and bilingual service representatives are present. Alternative service delivery systems include internet and phone banking, as well as bill-payment services that are accessible to all customers. Refer to FNBSF's CRA Public File for a current list of available products and 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.

Community Development Services

The level and nature of FNBSF's CD services in the Denver AA is very poor. The institution provided no CD services during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2009 to 12/31/2011) Investment and Service Tests and CD Loans: (02/28/2009 to 12/10/2012)	
Financial Institution		Products Reviewed
First National Bank of Santa Fe (FNBSF) Santa Fe, New Mexico		HMDA & CRA Loans; CD Loans, Investments, and Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>None.</i>		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New Mexico Santa Fe AA Albuquerque AA Los Alamos AA Colorado Denver AA	Full Scope Limited Scope Limited Scope Full Scope	

Appendix B: Summary of State Ratings

RATINGS				
First National Bank of Santa Fe				
	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multi-state Rating
Overall Bank:				
First National Bank of Santa Fe	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
New Mexico	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Colorado	Outstanding	Substantial Non-Compliance	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

Santa Fe AA

Demographic Information for Full-Scope Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	40	2.50	22.50	32.50	35.00	7.50
Population by Geography	129,292	1.79	26.00	35.95	36.26	0.00
Owner-Occupied Housing by Geography	35,977	0.84	24.88	36.23	38.05	0.00
Businesses by Geography	13,989	1.74	17.14	29.27	51.85	0.00
Farms by Geography	392	1.53	14.29	36.48	47.70	0.00
Family Distribution by Income Level	33,000	22.01	17.85	18.89	41.25	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,151	1.81	42.93	34.94	20.32	0.00
Median Family Income	= \$50,000		Median Housing Value		= \$196,766	
HUD Adjusted Median Family Income for 2011	= \$67,800		Unemployment Rate**		= 5.0%	
Households Below the Poverty Level	= 11.52%					

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

Source: 1990 U.S. Census, and 2011 HUD updated MFI.

(**) October, 2012; Source: Bureau of Labor Statistics

The Santa Fe AA consists of all geographies in Santa Fe County and the Santa Fe MSA. FNBSF operates its main office and six branches in the Santa Fe MSA. In addition, FNBSF operates a mobile office in the Santa Fe AA located in an upper-income retirement community. FNBSF's business focus in the Santa Fe AA is commercial and residential real estate lending. Competition for deposits is strong in the Santa Fe market. Eleven institutions compete for deposits in the Santa Fe MSA and FNBSF controls the largest market share with nearly 21% of the deposit market. Competitors include large and small national banks as well as state institutions.

Santa Fe is the capitol of New Mexico. The primary employment base in the Santa Fe MSA is state government, although federal and local governments also provide jobs. Tourism is a major industry for the area and the volume of tourism drives the Santa Fe economy. Retail and services jobs that support tourism provide the second largest employment opportunities for the area. The local economy normally moves in conjunction with the national economy although its beta is small suggesting that the downturn affected the area less severely. This is illustrated in part by the unemployment rate, which as of October 2012, was 5%, well below the national average of 7.9%.

Affordable housing continues to be a significant challenge in the MSA. The median housing value based on 2010 census data was \$337 thousand. With 12% of individuals in Santa Fe living below the poverty level and nearly 40% of the population characterized as low- or moderate-income, it is unlikely that this demographic could afford a traditional mortgage on the median home price.

The local government has responded to high housing costs by requiring residential developers to incorporate affordable housing in new subdivisions as a stipulation of building permits issued. These stipulations are having a positive impact on the supply of affordable housing. Affordable housing continues to present the greatest opportunity for CD lending in the area.

State of Colorado

Denver AA

Demographic Information for Full-Scope Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	545	3.85	26.61	39.63	27.89	2.02
Population by Geography	2,179,240	4.32	28.40	41.77	25.51	0.00
Owner-Occupied Housing by Geography	570,412	1.89	21.89	42.97	33.26	0.00
Businesses by Geography	240,273	3.02	19.57	37.92	38.74	0.75
Farms by Geography	5,671	1.50	18.13	41.74	38.18	0.46
Family Distribution by Income Level	550,797	18.01	18.65	23.68	39.66	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	201,889	7.68	41.89	37.34	13.08	0.00
Median Family Income	= \$61,301	Median Housing Value		= \$180,045		
HUD Adjusted Median Family Income for 2011	= \$78,200	Unemployment Rate**		= 7.8%		
Households Below the Poverty Level	= 7.31%					

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) October, 2012; Source: Bureau of Labor Statistics

The Denver AA represents the smallest portion of deposits for FNBSF. FNBSF obtains less than 1% of its total deposits from this AA, and it makes approximately 7% of its reportable loans here. FNBSF's business focus in the Denver AA is commercial and residential real estate lending. With only branch, it is not a major competitor in the Denver AA. The Bank operates one branch and no deposit-taking ATMs in this AA. The Denver AA is synonymous with the Denver-Aurora-Broomfield MSA.

The Denver-Aurora-Broomfield MSA is the 21st largest MSA in the United States with a population of over 2.5 million as of 2010. This represents over half of Colorado's population. Since the 2000 census, the population increased 17%. The AA consists of the following counties: Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park. The Denver-Aurora-Broomfield MSA is located in the Front Range area of eastern Colorado. The MSA has excellent north and south accessibility via Interstate 25, and east and west convenience of Interstate 70. Excellent rail service, including light rail, and the Denver International Airport are also available making this an ideal area for businesses.

The area is heavily banked with 71 chartered banks operating 715 branches. Wells Fargo Bank, N.A.; First Bank; JPMorgan Chase, N.A.; and U.S. Bank, N.A. have the largest presence with a 63% market share of deposits. FNBSF's market share is 0.01% with just \$5.8 million in deposits as of June 30, 2012.

As of October 2012, the unemployment rate for the MSA was 7.8% which is the slightly below the national unemployment rate of 7.9%. The most significant industries providing jobs in the

MSA are trade, transportation, utilities, professional services, government, leisure and hospitality, educational and health services, financial activities, construction and mining, manufacturing, information, and other services. The largest private employers are Century Link, HealthONE, King Soopers, Inc., United Airlines, Lockheed Martin, and Centura Health.

Colorado is the fifteenth wealthiest state in the country. This is reflective of the median family income for the MSA. Employers in Denver choose from a highly educated labor pool. The city ranks second in the nation for the number of residents with bachelor's degrees; and 64% of residents age 24 or older have attended college. The 2011 HUD-updated median family income for the MSA was \$78,200.

There are numerous CD organizations which provide affordable housing and community services to low- and moderate-income individuals, economic development activities, revitalization of low- and moderate-income areas, and small business financial and educational support. This offers financial institutions numerous opportunities to provide CD loans, investments, and services.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multi-state 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 30th 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. CD loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family 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

State of New Mexico

Table 1. Lending Volume

LENDING VOLUME												
Geography: New Mexico												
Evaluation Period: January 01, 2009 to December 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
Santa Fe AA	83.64	451	101,943	423	60,851	0	0	0	0	874	162,794	79.57
Limited Review:												
Albuquerque AA	12.15	75	17,330	52	12,915	0	0	0	0	127	30,245	5.00
Los Alamos AA	4.21	39	8,462	5	326	0	0	1	788	44	8,788	14.57
Statewide (Outside AA)	0	0	0	0	0	0	0	1	1,388	0	0	0

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is February 28, 2009 to December 10, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: New Mexico					Evaluation Period: January 01, 2009 to December 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Santa Fe AA	79	66.39	0.84	2.53	24.88	3.80	36.23	20.25	38.05	73.42	1.59	6.25	0.00	0.83	2.48	
Limited Review:																
Albuquerque AA	26	21.85	0.97	0.00	21.24	23.08	42.26	23.08	35.54	53.85	0.09	0.00	0.09	0.06	0.13	
Los Alamos AA	14	11.76	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	1.81	0.00	0.00	0.00	1.81	

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: New Mexico		Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Santa Fe AA	93	90.29	0.84	1.08	24.88	8.60	36.23	30.11	38.05	60.22	24.52	50.00	7.41	25.00	29.27			
Limited Review:																		
Albuquerque AA	6	5.83	0.97	0.00	21.24	16.67	42.26	66.67	35.54	16.67	0.42	0.00	0.00	0.67	0.34			
Los Alamos AA	4	3.88	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	8.33	0.00	0.00	0.00	8.33			

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: New Mexico				Evaluation Period: January 01, 2009 to December 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Santa Fe AA	278	81.52	0.84	0.72	24.88	9.35	36.23	23.74	38.05	66.19	1.52	0.00	1.07	0.73	2.12	
Limited Review:																
Albuquerque AA	43	12.61	0.97	0.00	21.24	11.63	42.26	18.60	35.54	69.77	0.09	0.00	0.09	0.00	0.16	
Los Alamos AA	20	5.87	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	1.17	0.00	0.00	0.00	1.17	

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY			Geography: New Mexico				Evaluation Period: January 01, 2009 to December 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Santa Fe AA	1	50.00	2.34	0.00	35.29	100.0	30.73	0.00	31.65	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Albuquerque AA	0	0.00	3.92	0.00	27.89	0.00	46.42	0.00	21.77	0.00	0.00	0.00	0.00	0.00	0.00	
Los Alamos AA	1	50.00	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by number of multi-family housing units in the area based on 2000 Census information.

****Multi-family loan distribution includes home purchase, 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 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Santa Fe AA	423	88.13	1.78	0.95	17.57	8.98	28.60	23.17	52.06	66.90	3.39	3.23	1.13	2.76	4.53			
Limited Review:																		
Albuquerque AA	52	10.83	1.46	0.00	23.10	21.15	45.17	48.08	30.27	30.77	0.13	0.00	0.21	0.12	0.11			
Los Alamos AA	5	1.04	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	0.45	0.00	0.00	0.00	0.46			

* Based on 2001 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 2011.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: New Mexico					valuation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans											
											Overall	Low	Mod	Mid	Upp						
Full Review:																					
Santa Fe AA	0.00	0.00	1.49	0.00	15.17	0.00	36.32	0.00	47.01	0.00	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Albuquerque AA	0.00	0.00	0.97	0.00	21.91	0.00	49.76	0.00	27.36	0.00	0.00	0.00	0.00	0.00	0.00						
Los Alamos AA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2011 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 2011.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: New Mexico								Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Santa Fe AA	79	66.39	22.01	0.00	17.85	5.19	18.89	10.39	41.25	84.42	2.03	0.00	0.00	0.89	3.52
Limited Review:															
Albuquerque AA	26	21.85	20.93	0.00	17.46	7.69	20.34	11.54	41.27	80.77	0.11	0.00	0.05	0.10	0.21
Los Alamos AA	14	11.76	2.57	0.00	3.00	7.14	5.22	0.00	89.20	92.86	2.05	0.00	0.00	0.00	2.24

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: New Mexico								Evaluation Period: January 01, 2009 to December 31, 2011					
MA/Assessment Area:	Total Home Improvement 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
Full Review:															
Santa Fe AA	93	90.29	22.01	16.48	17.85	13.19	18.89	18.68	41.25	51.65	24.67	31.58	12.50	21.62	28.57
Limited Review:															
Albuquerque AA	6	5.83	20.93	20.00	17.46	0.00	20.34	40.00	41.27	40.00	0.29	0.00	0.00	0.58	0.31
Los Alamos AA	4	3.88	2.57	0.00	3.00	0.00	5.22	25.00	89.20	75.00	8.33	0.00	0.00	50.00	0.00

* Based on 2010 Peer Mortgage Data.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: New Mexico			Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share								
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Santa Fe AA	278	81.52	22.01	2.58	17.85	12.92	18.89	23.99	41.25	60.52	1.89	0.52	1.53	1.88	2.13				
Limited Review:																			
Albuquerque AA	43	12.61	20.93	0.00	17.46	2.38	20.34	26.19	41.27	71.43	0.11	0.00	0.00	0.06	0.18				
Los Alamos AA	20	5.87	2.57	5.00	3.00	10.00	5.22	0.00	89.20	85.00	1.28	25.0	0.00	0.00	1.18				

* Based on 2010 Peer Mortgage Data.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: New Mexico		Evaluation Period: January 01, 2009 to December 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Santa Fe AA	423	88.13	66.63	55.56	72.58	13.48	13.95	3.39	3.66
Limited Review:									
Albuquerque AA	52	10.83	68.75	32.69	30.77	34.62	34.62	0.13	0.11
Los Alamos AA	5	1.04	65.58	40.00	80.00	20.00	0.00	0.45	0.00

* Based on 2011 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 - 2011).

**** 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 21.46% 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 01, 2009 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Santa Fe AA	0	0.00	97.51	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Albuquerque AA	0	0.00	95.64	0.00	0.00	0.00	0.00	0.00	0.00
Los Alamos AA	0	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011Peer 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 - 2011).

**** 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% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: New Mexico				Evaluation Period: February 28,2009 TO December 10, 2012			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Santa Fe AA	3	866	20	769	23	1,163	93.56	0	0
Limited Review:									
Los Alamos AA	0	0	0	0	0	0	0	0	0
Albuquerque AA	0	0	0	0	0	0	0	0	0
Statewide	0	0	2	80	2	80	6.44	1	21
Regional	0	0	0	0	0	0	0	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: February 28, 2009 To December 10, 2012			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full Review:																					
Santa Fe AA	80.26	8	72.73	0	0	12.5	87.5	0	1	0	0	0	-1	1.40	29.81	35.71	33.08				
Limited Review:																					
Los Alamos AA	14.70	1	9.09	0	0	0	100	0	0	0	0	0	0	0	0	0	100				
Albuquerque AA	5.04	2	18.18	0	0	100	0	1	0	0	0	+1	0	2.64	27.07	40.95	29.34				

Tables of Performance Data

State of Colorado

Table 1. Lending Volume

LENDING VOLUME												
Geography: Colorado												
Evaluation Period: January 01, 2009 to December 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Denver AA	100.0	19	8,006	33	6,676	0	0	1	1,100	52	14,682	0.86

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is February 28, 2009 to December 31, 2012 .

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: Colorado		Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Denver AA	7	100.0	1.89	14.29	21.89	28.57	42.97	28.57	33.26	28.57	0.00	0.08	0.00	0.00	0.01						

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: Colorado		Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Denver AA	0	0.00	1.89	0.00	21.89	0.00	42.97	0.00	33.26	0.00	0.00	0.00	0.00	0.00	0.00			

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: Colorado								Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver AA	12	100.0	1.89	0.00	21.89	8.33	42.97	25.00	33.26	66.67	0.01	0.00	0.00	0.00	0.01

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

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

Table 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: Colorado				Evaluation Period: January 01, 2009 to December 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
Denver AA	0	0.00	8.54	0.00	40.67	0.00	42.00	0.00	8.79	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Mortgage Data

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by number of multi-family housing units in the area based on 2000 Census information.

****Multi-family loan distribution includes home purchase, home improvement, and refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Colorado			Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans									
Full Review:																			
Denver AA	33	100.0	3.23	6.06	20.61	18.18	37.60	27.27	37.57	48.48	0.02	0.05	0.01	0.01	0.02				

* Based on 2001 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 2011.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: Colorado		E valuation Period: January 01, 2009 to December 31, 2011		
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Denver AA	0.00	0.00	1.55	0.00	18.64	0.00	41.31	0.00	37.99	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2011 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 2011.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: Colorado				Evaluation Period: January 01, 2009 to December 31, 2011					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Denver AA	7	100.0	18.01	0.00	18.65	16.67	23.68	16.67	39.66	66.67	0.00	0.00	0.00	0.01	0.01	

* Based on 2010 Peer Mortgage Data

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Colorado						Evaluation Period: January 01, 2009 to December 31, 2011							
MA/Assessment Area:	Total Home Improvement 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
Full Review:															
Denver AA	0	0.00	18.01	0.00	18.65	0.00	23.68	0.00	39.66	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Mortgage Data.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Colorado			Evaluation Period: January 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share								
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Denver AA	12	100.0	18.01	0.00	18.65	0.00	23.68	9.09	39.66	90.91	0.01	0.00	0.00	0.00	0.01				

* Based on 2010 Peer Mortgage Data.

** 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Colorado		Evaluation Period: January 01, 2009 to December 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Denver AA	33	100.0	68.67	54.55	36.36	39.39	24.24	0.02	0.02

* Based on 2011 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 - 2011).

**** 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 21.46% 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 01, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Denver AA	0	0.00	96.45	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011Peer 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 - 2011).

**** 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% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Colorado				Evaluation Period: February 28, 2009 TO December 10, 2012			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver AA	0	0	0	0	0	0	0	0	0
Limited Review:									
Statewide	0	0	0	0	0	0	0	0	0
Regional	0	0	0	0	0	0	0	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: February 28, 2009 To December 10, 2012			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full Review:																					
Denver AA	100	1	100	0	0	100	0	1	1	0	0	0	0	4.56	27.72	40.28	27.32				