



## **PUBLIC DISCLOSURE**

September 24, 2018

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

Native American Bank, National Association  
Charter Number 21158

999 18th Street, Suite 2460  
Denver, CO 80202

Office of the Comptroller of the Currency

Denver Field Office  
1225 17th Street, Suite 450  
Denver, CO 80202

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

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## **Overall CRA Rating: Outstanding**

**The Lending Test is rated: Outstanding**

**The Community Development Test is rated: Outstanding**

- The bank's average loan-to-deposit ratio is more than reasonable when compared with similarly situated banks.
- Native American Bank, National Association (NAB) originated a majority of loans by number within its assessment areas (AAs).
- The bank's distribution of loans to businesses and individuals of different income levels is reasonable.
- The geographic distribution of loans reflects an excellent dispersion throughout the AAs.
- NAB's community development (CD) performance demonstrates excellent responsiveness to the CD needs of its AAs.
- NAB received no consumer complaints concerning its performance in meeting the community's credit needs.

## Definitions and Common Abbreviations

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

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

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

NAB is a multistate bank with offices in Colorado and Montana. Its corporate headquarters, which also functions as a full-service branch, is in Denver, CO. The bank also operates one branch in Browning, MT. Additionally, NAB operates a loan production office (LPO) in Box Elder, MT. The bank operates two deposit taking ATMs, one at the branch in Browning, MT and one at the LPO in Box Elder, MT.

In 2001, NAB acquired the Blackfeet National Bank, located on the Blackfeet Indian reservation, where the bank continues to have their full-service branch in Browning, MT. NAB opened the Denver office in 2006 and while it is a full service office, it primarily serves as the corporate headquarters for NAB and Native American Bancorporation, a one-bank holding company. The majority of holding company shareholders are Native American or Alaskan Native tribes or corporations. NAB's business mission and focus is to assist Native American and Alaskan Native individuals, enterprises, and governments to reach their goals by providing affordable and flexible banking and financial services.

As of June 30, 2018, assets totaled \$102 million and net loans represented 78 percent of total assets. NAB provides a variety of lending and deposit services to support the needs of consumers, small businesses, and farms within their assessment area, with a focus on Native Americans.

The bank's primary loan products are consumer and commercial. Consumer loans represent 53 percent of the loan portfolio by number of loans. Commercial loans represent 97 percent of the loan portfolio by dollar amount. The composition of the loan portfolio on June 30, 2018 is summarized in the following table:

Loan Portfolio Summary as of June 30, 2018				
Loan Type	Number of Loans	Outstanding Balance	% by Number	% by Dollar
Agricultural	14	512,100	6%	1%
Commercial	61	79,153,385	24%	97%
Consumer	146	743,821	58%	1%
1-4 Family	29	1,228,440	12%	2%
Total Loan Portfolio	250	81,637,746	100%	100%

Source: Call Report Data

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment area. The bank received an "Outstanding" rating at the prior CRA examination dated February 27, 2012. Please refer to the bank's *CRA Public File* for more information.



## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We performed a full-scope review of the bank's CRA performance using interagency small bank procedures. We concluded on the bank's CRA performance in Montana and Colorado by reviewing the bank's average loan-to-deposit ratio since the previous CRA examination and by testing the bank's lending activity inside the AAs. We also tested borrower income and geographic distribution for the bank's primary loan products. The evaluation period for the lending test is from January 1, 2015, to December 31, 2017. Additionally, we reviewed NAB's qualified community development activities.

### **Data Integrity**

We did not perform a formal data integrity review as the institution is not a Home Mortgage Disclosure Act (HMDA) reporter.

### **Selection of Areas for Full-Scope Review**

We selected the Montana AA to receive a full-scope review because the bank has designated that area as their primary AA. We analyzed quantitative and qualitative factors in the full-scope AA. We analyzed the Denver AA with a limited-scope review, using quantitative factors only. Refer to Appendix A: Scope of Examination for additional information.

### **Ratings**

The bank's overall rating is based primarily on the bank's CRA performance within the Montana AA because that is the bank's primary AA. The bank's CRA performance in the Denver AA is given less weight because the bank has not historically focused their lending or deposit gathering activities in that AA.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Criteria

### Loan-to-Deposit Ratio

**The bank's loan to deposit ratio is more than reasonable when compared to similarly situated banks.**

NAB's average quarterly loan to deposit ratio over the review period is 90 percent, which compares favorably to similarly situated banks. NAB's average quarterly loan to deposit was higher than any comparable bank included in the analysis. The average quarterly loan to deposit ratio for similarly situated banks, over the same time period, ranged between 50 percent and 80 percent with an average of 63 percent. We identified seven similarly situated banks and all were included in the analysis. Similarly situated banks are those operating within the same geography and with similar asset sizes.

### Lending in Assessment Area

**A majority of loans in the sample, by number, are inside the bank's AA. A substantial majority of loans in the sample, by dollar volume, are outside the bank's AA. Overall, lending within the assessment area meets the standards for satisfactory performance.**

The level of lending within the bank's AA is reasonable because there are limited opportunities for the bank to lend large dollar commercial loans within the AA. Additionally, nearly all of their consumer lending occurs within the AA.

We sampled 30 of the 476 consumer loans originated from January 1, 2015 to December 31, 2017. For the consumer loan sample, 97 percent by number and 98 percent by dollar volume, were originated within the bank's AA. We also sampled all 34 of the commercial loans originated during the evaluation period. For the commercial loan sample, 18 percent by number and 6 percent by dollar volume, were originated within the bank's AA. These results are consistent with NAB's strategy of lending to Native American and Alaskan Native companies and tribes across the country. There is insufficient commercial loan demand within the bank's AA for the bank to focus solely on that area. NAB lends to their AA when opportunities present themselves, usually in the form of small dollar consumer loans. Their lending efforts within the AA are evidenced by the high percentage of consumer loans originated within the AA.

The combined sample of consumer and commercial loans indicates that 55 percent by number and 7 percent by dollar volume were originated within the bank's AA. The dollar volume originated within the AA is depressed because of the difference in average loan size for consumer and commercial loans. The average consumer loan in the sample was \$2,000, while the average commercial loan in the sample was \$1.9 million. When the large dollar commercial loans are included with the small dollar consumer loans, the percentage originated within the AA by dollar volume drops dramatically.

**Table 1 - Lending in the Montana Rural Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer	29	96.7	1	3.3	30	68	97.7	2	2.3	69
Commercial	6	17.6	28	82.4	34	4,183	6.4	60,993	93.6	65,176
<b>Total</b>	<b>35</b>	<b>54.7</b>	<b>29</b>	<b>45.3</b>	<b>64</b>	<b>4,251</b>	<b>6.5</b>	<b>60,994</b>	<b>93.5</b>	<b>65,245</b>

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data  
Due to rounding, totals may not equal 100.0

## COMMUNITY DEVELOPMENT

### Qualified Investments and Community Development Services

NAB demonstrates a strong level of CD qualified investments based on its size and financial capacity. NAB made six qualified CD investments during the CRA exam period, for a total of \$1.4 million, representing 14.8 percent of tier 1 capital as of December 30, 2017.

NAB was also responsive to CD needs during the CRA exam period with a total of 24 documented hours of service with two organizations. The bank has partnered with the Native American Community Development Corporation (NADC) to provide financial literacy training to Blackfeet Reservation members located in Browning, MT. The bank also provides financial literacy training in conjunction with Blackfeet Community College. In addition to the financial literacy training, NAB provides retail services with their partnership with NADC in the form of their Mini-Bank program. The program provides financial education and early access to banking services for youth located in Browning, MT. NAB has also proactively looked to engage with the unbanked and underbanked population, free of charge with their annual free check cashing program.

### Qualified Community Development Loans

NAB provided information on five qualified CD loans originated during the evaluation period. The information provided demonstrates NAB's willingness to provide community development loans within their AA and across the country. The five loans totaled \$6.4 million and were used to provide affordable housing (\$4.0 million) and help promote job growth in low- and moderate income (LMI) areas (\$2.4 million).

These CD loans, totaling 69.7 percent of tier 1 capital as of June 30, 2017, retained or created 52 full time jobs in low-income, moderate-income, or economically distressed census tracts. The largest CD loan provided permanent funding for 50 affordable housing units restricted to low- or moderate-income individuals within the banks rural Montana AA.

## State Rating

### State of Montana

#### CRA rating for the State of Montana: Outstanding

- The distribution of consumer loans to borrowers of different income levels within the AA is reasonable.
- The geographic distribution of loans reflects an excellent dispersion throughout the AAs
- Community development qualified loans originated during the evaluation period demonstrate NAB's willingness to support the AA.
- NAB received no consumer complaints concerning its performance in meeting the community's credit needs since the last performance evaluation.

#### Description of Institution's Operations in Montana

NAB has designated six contiguous counties in Montana as its primary assessment area. The designated AA includes Glacier, Hill, Liberty, Pondera, Toole, and Chouteau counties and wholly includes the Blackfeet and Rocky Boy reservations. The designated AA complies with applicable regulatory requirements and does not arbitrarily exclude any LMI areas.

Based on 2015 ACS US Census data, the population for the AA was 50,000. The AA is comprised of 18 census tracts and includes one low-income tract, three moderate-income tracts, 11 middle-income tracts, one upper-income tract, and two tracts noted as not applicable. The weighted average updated median family income for 2017 was \$60,500. The unemployment rate for the AA is 4 percent and 20 percent of households are below poverty level.

The Browning, MT branch is located on the Blackfeet Indian Reservation. The Blackfeet Nation has over 17,300 registered members. The main community is Browning, which is the seat of the tribal government. The reservation's unemployment rate and poverty rate are notably higher than the overall AA at 19 percent and 39 percent, respectively.

Also located within the bank's AA is the Rocky Boy Reservation of the Chippewa-Cree Indians. The Rocky Boy Indian Reservation is located in Hill and Chouteau counties in northcentral Montana, about 40 miles from the Canadian border. The reservation is home to approximately 2,500 tribal members and has a total land area of 171 square miles. The reservation's unemployment rate and poverty rate are notably higher than the overall AA at 16 percent and 41 percent, respectively.

In addition to the Browning, MT office, NAB operates a LPO in Box Elder, MT and deposit taking ATMs at the LPO and office in Browning.

We reviewed a recently completed community contact interview conducted by another regulatory agency. The interview was with the Executive Director of a non-profit organization that administers programs to help improve the regional economic conditions of an area within the bank's AA. The community contact indicated that the area's credit needs are being met by the local financial institutions. The contact had a favorable view of local financial institutions.

## **Scope of Evaluation in Montana**

We performed a full-scope review of the Montana Rural AA because the bank has designated that area as their primary AA. We evaluated the bank's CRA performance using the lending test and considered information provided by the bank related to its community development activities.

## **Conclusions With Respect to Performance Tests in Montana**

### **LENDING TEST**

NAB's lending performance, as augmented by community development qualified loans, is outstanding.

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

#### **The distribution of consumer and commercial loans reflects reasonable penetration of the bank's AA.**

The table below details the bank's loan distribution by borrower income level for consumer loans originated during the evaluation period. Of the 29 consumer loans included in our sample that were originated within the AA, 17 or 58.6 percent were originated to LMI borrowers. This compares favorably to area demographic reports which note 44.6 percent of the households being LMI households.

The bank originated six commercial loans within the AA during the evaluation period. Although the sample size is limited and the analysis is not truly meaningful, three loans were originated to businesses with annual revenues of less than \$1 million and three loans were originated to businesses with annual revenues of over \$1 million. This is reasonable given the AA demographics. Demographic reports note that 77.2 percent of businesses in the AA have annual revenues under \$1million, 5.8 percent have revenues over \$1 million, and 17.0 percent do not have revenue figures available.

Borrower Distribution of Consumer Loans in the Montana Rural AA								
	Low		Moderate		Middle		Upper	
Borrower Income Level	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	27.7	6.9	16.9	51.7	17.1	24.1	38.4	17.2

Source: 2015 ACS Census; 01/01/2015 – 12/31/2017 Bank Data

Due to rounding, totals may not equal 100.0

### Geographic Distribution of Loans

The geographic distribution of consumer loans within the Montana Rural AA is excellent. Of the consumer loans in our sample, 95 percent by number were originated in moderate-income CTs and five percent by number were originated in middle-income CTs. The bank's level of consumer loans originated to borrowers in LMI tracts significantly exceeds the demographic data for the AA. LMI households represent 29.6 percent of the households in the AA compared with 95 percent of the bank's loans originated to LMI CTs.

Table Geographic Distribution of Consumer Loans in the Montana Rural AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	3.1	0.0	26.5	95.0	64.6	5.0	5.8	0.0

Source: 2015 ACS Census; 01/01/2015 – 12/31/2017 Bank Data

Due to rounding, totals may not equal 100.0

The bank did not originate a sufficient number of commercial loans within the AA to perform a meaningful analysis; however all six of the commercial loans originated within the bank's AA during the assessment period were originated in middle-income CTs. The bank has limited opportunities to originate commercial loans within its AA due to low demand.

### Responses to Complaints

NAB did not receive any CRA related complaints during the review period.

## **State of Colorado**

### **CRA rating for the State of Colorado: Satisfactory**

- There were no loans originated in the Denver AA during the evaluation period.
- NAB holds a very small deposit market share in the Denver metropolitan statistical area (MSA).
- There were no CRA related complaints within the Denver MSA since the prior examination.

### **Description of Institution's Operations in Colorado**

NAB's Denver office houses its corporate headquarters and also functions as a full-service branch. Although it is a full-service branch, deposit and lending activity is limited. As of June 30, 2017, the bank had three loans outstanding in the Denver MSA which represented one percent of its total loan book value. As of June 30, 2017, NAB held 0.13 percent of deposits within the Denver MSA. The Denver MSA has not been a primary focus for the bank's loan production or deposit gathering activities.

Based on 2015 ACS US Census data, the population for the Denver MSA was 2.7 million. The Denver MSA is comprised of 621 census tracts and includes 51 low-income tracts, 150 moderate-income tracts, 205 middle-income tracts, 207 upper-income tracts, and eight tracts noted as not applicable. The weighted average updated median family income for 2017 was \$83,900. The unemployment rate for the AA is 5 percent and 11 percent of households are below poverty level.

### **Scope of Evaluation in Colorado**

We performed a limited-scope review of the Denver AA because NAB had limited activity within this AA. The bank did not originate any loans within the Denver AA during the evaluation period and the bank does not hold a significant amount of the deposit market share.

### **Conclusions With Respect to Performance Tests n Colorado**

#### **LENDING TEST**

NAB did not originate any loans within the Denver AA during the evaluation period.

#### **Responses to Complaints**

NAB did not receive any CRA related complaints during the review period.



## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2015 to 12/31/2017 CD Loans: 01/01/2015 to 12/31/2017	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Native American Bank, NA (NAB), Denver, CO	Consumer loans, Business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Montana Rural AA (Glacier, Pondera, Toole, Liberty, Hill, and Chouteau counties)	Full-Scope	
Denver AA	Limited-Scope	

# Appendix B: Summary of State Ratings

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Native American Bank	
Overall Rating:	Outstanding
State Ratings:	
Montana	Outstanding
Colorado	Satisfactory

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

### Montana Rural AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Montana Rural AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	5.6	16.7	61.1	5.6	11.1
Population by Geography	49,775	11.1	20.2	61.8	5.6	1.2
Housing Units by Geography	21,529	8.5	20.9	65.0	5.3	0.2
Owner-Occupied Units by Geography	11,355	6.1	16.8	69.5	7.6	0.0
Occupied Rental Units by Geography	6,379	14.9	26.9	54.8	3.3	0.1
Vacant Units by Geography	3,795	5.1	23.3	68.9	1.7	1.1
Businesses by Geography	3,197	4.1	23.7	69.2	2.9	0.1
Farms by Geography	1,108	0.3	21.7	76.8	1.3	0.0
Family Distribution by Income Level	11,756	28.4	18.4	19.9	33.3	0.0
Household Distribution by Income Level	17,734	29.9	16.9	16.6	36.6	0.0
Median Family Income Non-MSAs - MT		\$59,958	Median Housing Value			\$114,076
			Median Gross Rent			\$519
			Families Below Poverty Level			18.2%
<i>Source: 2010 U.S. Census &amp; 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Management designated Glacier, Pondera, Toole, Liberty, Hill, and Chouteau Counties as their primary non-MSA AA. The designated AA encompasses five census tracts (CTs) in Glacier County, two CTs in Pondera County, two CTs in Toole County, one CT in Liberty County, six CTs in Hill County, and two CTs in Chouteau County for a total of 18 CTs. The AA complies with applicable regulatory requirements and does not arbitrarily exclude any LMI areas. The AA contains seven CTs noted as distressed middle-income nonmetropolitan tracts and 11 CTs noted as underserved CTs. As of June 30, 2017, NAB ranked 8<sup>th</sup> out of 8 financial institutions operating in the AA for deposit market share. The service industry is the primary industry for the AA, followed by agriculture.