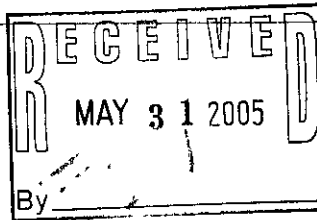




SUNRISE BANK OF ALBUQUERQUE

May 20, 2005

William J. Verant  
Financial Institutions Director  
State of New Mexico  
P. O. Box 25101  
Santa Fe, NM 87504-5101



File \_\_\_\_\_  
 Washington \_\_\_\_\_  
 FS \_\_\_\_\_  
 State \_\_\_\_\_  
 RD \_\_\_\_\_  
 DRD \_\_\_\_\_  
 ARD JSS ARD \_\_\_\_\_  
 ARD \_\_\_\_\_ ARD \_\_\_\_\_  
 ARD \_\_\_\_\_ SES \_\_\_\_\_  
 CM \_\_\_\_\_  
 CM Malone \_\_\_\_\_  
 SFA \_\_\_\_\_  
 TNG. Coord. \_\_\_\_\_  
 Admin. Officer \_\_\_\_\_  
 Legal \_\_\_\_\_  
 Dist. By \_\_\_\_\_  
 Date Dist \_\_\_\_\_  
 Other \_\_\_\_\_

Dear Mr. Verant:

We are in receipt of a copy of the press release issued by the FDIC announcing that a public hearing has been scheduled on May 24, 2005, on a preemption petition from the Financial Services Roundtable (Roundtable), a trade organization for integrated financial services companies. The Roundtable has asked the FDIC to issue a rule that would provide that a state bank's home state law governs its interstate activities and those of its subsidiaries to the same extent that the National Bank Act governs a national bank's interstate business. In its request, the Roundtable indicated its belief that such a rule would create parity between state-chartered banks and national banks with interstate activities and operations.

We are opposed to this prospective rule as it would allow state banking organizations to exercise all of the preemptive rights of national banks and serves to penalize those banks which are not multi-state based such as ours. This proposal threatens the viability of the dual banking system and serves to homogenize banking rules without any reference to the preservation of the small community bank. We would greatly appreciate your consideration of our position in this matter.

Sincerely,

Jason A. Shaffer  
President and CEO

✓ Cc: Regional Director  
Federal Deposit Insurance Corporation  
1910 Pacific Avenue Suite 1900  
Dallas, TX 75201-4526