

Western Bank

P.O. Box 490
Lordsburg, New Mexico 88045

May 19, 2015

VIA CERTIFIED MAIL

United States Department of Labor
Employee Benefits Security Administration
Top Hat Plan Exemption
200 Constitution Ave., N.W., Ste N-1513
Washington, D.C. 20210

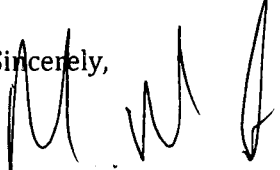
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RE: Strategic Achievement Reward (StAR) Plan for Western Bank, Lordsburg, New Mexico

Dear Sir or Madam:

In accordance with Department of Labor Regulation § 2520.104-23, this letter will serve as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for a pension plan for a select group of management or highly compensated employees.

1. Western Bank (the "Sponsor"), a New Mexico corporation, maintains and sponsors a nonqualified Strategic Achievement Reward Plan (the "Plan").
2. The address of the Sponsor is PO Box 490 / 140 East Motel Drive, Lordsburg, NM.
3. The employer identification number assigned by the Internal Revenue Service to the Sponsor is 85-0036735.
4. The Sponsor declares it maintains the following plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. There are six (6) employees currently participating in the Plan.
6. A copy of the plan document will be furnished upon request.

Sincerely,


Michael R. Martin, President / CEO



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ZIP 68045
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RETURN SERVICE REQUESTED

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