



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

June 01, 2004

Community Reinvestment Act Performance Evaluation

**First National Bank of Nevada
Charter Number: 18667**

**6275 Neil Road
Reno, Nevada 89511**

Office of the Comptroller of the Currency

**Arizona & New Mexico
9633 South 48th Street Suite 265
Phoenix, Arizona 85044**

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.

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS	2
DESCRIPTION OF INSTITUTION	5
SCOPE OF THE EVALUATION	6
FAIR LENDING REVIEW	7
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	8
LENDING TEST	8
INVESTMENT TEST	13
SERVICE TEST	13
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

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

The following table indicates the performance level of **First National Bank of Nevada** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Nevada Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	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:

- An adequate distribution of loans in low- and moderate-income (LMI) geographies and to LMI borrowers in the bank’s full scope AAs.
- Overall good lending levels in the bank’s full-scope AAs.
- Investment activity that represents an adequate response in the bank’s full-scope AA.
- Branch delivery systems which provide good accessibility to individuals and small businesses in LMI census tracts in the bank’s full-scope AAs.
- A good level of community development services in both full-scope AAs.

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/AA.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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 multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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 household 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 or a block numbering area 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 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).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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/AA.

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 Statistical Area (MSA): Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan statistical area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

First National Bank of Nevada (FNBVN) is an intrastate bank headquartered in Reno, Nevada. At March 31, 2004, the bank's net tier one capital was \$73.2 million and total assets were just over \$1 billion. The bank has grown substantially over the last five years from \$122 million total assets in 1999. FNBVN's net loans to total assets ratio at December 31, 2003, was 51%, a 5-year low and a decline from a high of 73% in 2000.

The bank is a subsidiary of First National Bank Holding Company (FNBHC), located in Scottsdale, Arizona. FNBHC had total assets of \$1.75 billion as of December 31, 2003. The holding company was formed in 1998 to acquire FNBVN (originally Laughlin National Bank). At the time of purchase, Laughlin National Bank was a \$40 million bank with two branches in Laughlin, Nevada. The holding company acquired one additional affiliate bank in 1999, First National Bank of Arizona, also headquartered in Scottsdale. FNBVN has two of its own affiliates: These subsidiaries have a negligible influence on the bank's ability to lend or invest in its community. Falcon Capital LLC is an auto leasing business, which is no longer active. Humboldt Merchant Services, a merchant credit card processing operation was acquired in 2003 and is moderately profitable. The bank's growth was supported by the 2003 purchase of \$200 million in deposits from three First Republic Bank branches in Las Vegas. These acquired deposits were invested in federal funds sold which is the primary reason for the decline in net loans to total assets in 2003.

The bank has maintained growth consistent with the population in the locations it conducts business. Laughlin, Nevada was the focus from 1998-2000, but FNBVN expanded into the Reno market in 1999, and into the Las Vegas market in 2000 and 2001. FNBVN now operates nine branches in the three Nevada AAs. The bank has six branches in the Las Vegas MSA, two branches in the Reno MSA, and one branch in Carson City County (located in a non-MSA). The AAs meet the legal requirements of the CRA and do not unreasonably exclude LMI geographies.

FNBVN's primary business strategy historically is the mortgage lending operation. The bank's residential real estate loan growth has fueled overall growth for the last five years. Residential real estate loans grew from \$17 million as of December 31, 1999, to \$173 million as of December 31, 2003. Commercial loans including real estate increased from \$16 million to \$173 million during this same time period and construction and development loans grew from \$21 million to \$128 million.

Since the residential real estate loans funded by FNBVN are 100% sold through the secondary market, the balances above do not reflect the full mortgage lending activity at the bank. The actual HMDA volume grew from \$127 million in 2000 to \$308 million in 2003.

There are no financial or legal impediments that hinder the bank's ability to help meet the credit needs of its AAs. The prior rating of Laughlin National Bank was "Satisfactory" as of December 1997, but is not considered comparable or meaningful since that was a small bank under prior management, and this is a significantly changed large bank.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considered FBNBV's HMDA-reportable loans for the period of January 1, 2000, to December 31, 2003. Small loans to businesses (CRA loans) were considered for the period of January 1, 2003, to December 31, 2003; the bank was not required to collect this data prior to 2003. Community development loans, investments, and services were evaluated for the period beginning December 1, 1997, to June 1, 2004.

For the HMDA and CRA lending data, it is important to note that our review covers two reporting periods—those loans which were reported using 1990 census data (2000-2002 loan originations/purchases) and those which were reported using 2000 census data (2003 loan originations/purchases). Due to the significant changes in the demographics from one census year to another, loan data for the two reporting periods was analyzed separately. The lending tables in appendix C reflect those changes. See the Reno MSA and Las Vegas MSA market profiles in appendix B for additional detail.

Data Integrity

Prior to this examination, we reviewed the bank's controls and procedures for gathering reportable loan data and the quality control process for insuring accuracy. We also selected a sample of loans for the years 2000-2003 to test accuracy of the reported data. Although the testing revealed errors in the HMDA data, the errors were not so significant as to render the data unreliable for analysis. The 2003 CRA loan data revealed significant errors; however, the data was corrected prior to submission in March 2004. Our evaluation of the small loans to businesses is based on accurate data.

Selection of Areas for Full-Scope Review

Full scope reviews were performed for the Reno MSA and the Las Vegas MSA. The 2003 data indicates that combined, FBNBV obtained 90% of its deposits and originated/purchased approximately 93% of its reportable loans in these AAs. Consequently, these AAs are representative of the bank's activities in Nevada, and the bank's ratings are based primarily on results in these AAs.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. The Reno AA carried somewhat more weight in the final conclusions given its higher percentage of loans. See appendix A for additional information. In evaluating the bank's lending performance, we placed more weight on HMDA loans and only minimal weight on small loans to businesses. The volume of HMDA loans far outnumbers the volume of small loans to businesses, and is most reflective of the bank's lending focus during the review period. The bank changed its lending focus to small business loans in mid-2002; however, the number of small business reportable loans is not significant, particularly in the Reno AA. Within the home mortgage loan categories, we placed slightly greater emphasis on home purchase lending than on home refinance in arriving at our conclusions, since home purchase

lending is identified as a primary need in the AAs. We did not place any weight on home improvement loans since the number of these loans is not significant. We placed greater weight on the 2000-2002 reporting period as this represents a majority of the bank's lending during this review period.

Other

We considered information obtained from community groups in our analysis. Please see the market profiles for the Reno and Las Vegas MSAs in appendix B for additional information.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in both the Reno MSA and the Las Vegas MSA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity for the 2000-2002 and the 2003 reporting periods.

Overall, lending levels are good. For both reporting periods combined, FNB NV reported 3,376 loans in the Reno MSA and 769 loans in the Las Vegas MSA. Of the total loans originated/purchased in both AAs during this time, 96% were home mortgage loans and 4% were small loans to businesses. Home mortgage loan originations/purchases for all reporting years in both full-scope AAs consist of 51% home purchase, 1% home improvement, and 48% home refinance loans. The bank did not originate any small loans to farms.

A review of the volume of lending in the Reno MSA indicates excellent performance. Based on 2003 deposit data, the bank ranks twelfth in deposits with a market share of 2.17%. Based on 2002 HMDA market share data, the bank ranks eighth for home purchase lending with a market share of 4.71%, fourth for home improvement lending with a market share of 6.43% and ninth for home refinance lending with a market share of 2.96%.

A review of the volume of lending indicates adequate performance in the Las Vegas MSA. This conclusion is based on the fact that the bank has been in the Las Vegas AA a short period of time and has not yet established a lending market. In addition, the bank's deposits include \$200 million in deposits that were purchased in 2003 rather than gathered from its AA. Based on 2003 deposit data, the bank ranks ninth in deposits with a market share of 1.78%. Based on 2002 HMDA market share data, the bank ranks seventy-sixth for home purchase lending with a market share of 0.21%, fifty-second for home improvement lending with a market share of 0.09%, and eighty-third for home refinance lending with a market share of 0.20%. The 2003 aggregate market share data for small loans to businesses is not currently available.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of the bank's lending reflects adequate distribution of HMDA loans and excellent distribution of small loans to businesses in LMI geographies in both full-scope AAs.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases for the 2000-2002 and the 2003 reporting periods.

The overall geographic distribution of all home mortgage loan products is adequate in both the Reno and Las Vegas MSAs.

The geographic distribution of home purchase loans is adequate in the Reno MSA. The bank did not make any home purchase loans in low-income CTs during the 2000-2002 reporting period; the portion made during the 2003 reporting period is significantly below the portion of owner-occupied units. However, this is mitigated by the fact that opportunities are limited in low-income CTs in the Reno MSA; there are only 775 owner-occupied units in these tracts noted in the 2000 census data and only 22 noted in the 1990 census data. The portion of home purchase loans is below the portion of owner-occupied units in moderate-income CTs for the 2000-2002 reporting period, but near to the demographics for the 2003 reporting period. The 2002 market share indicates the bank's market share for loans in moderate-income CTs exceeds overall market share. The bank does not have a market share for loans made in low-income CTs.

The geographic distribution of home purchase loans is adequate in the Las Vegas MSA. The portion of these loans made in low-income CTs exceeds the portion of owner-occupied units in these tracts for the 2000-2002 reporting period but the bank did not make any loans in low-income CTs during the 2003 reporting period. This is mitigated by the fact that opportunities for home mortgage lending were limited; the 2000 census data indicates there were only 848 owner occupied units in these tracts. The distribution of loans in moderate-income CTs is significantly below the portion of owner occupied housing units in these CTs for the 2000-2002 reporting period; it exceeds the demographics for the 2003 reporting period. The 2002 market share for loans made in low-income CTs exceeds overall market share. The bank does not have a significant market share for loans made in moderate-income CTs. Overall market share is significantly below 1%.

An analysis of the geographic distribution of home improvement loans in both the Reno and Las Vegas MSAs is not meaningful due to the small number of loans the bank originated during both review periods. The bank originated only 46 home improvement loans in the Reno MSA in all the years combined. The number of home improvement loans in the Las Vegas MSA is negligible; in all the years combined, the bank originated only five home improvement loans in this AA.

The geographic distribution for home refinance loans is adequate in the Reno MSA. In the 2000-2002 reporting period, the bank did not make any home refinance loans in low-income CTs, and in 2003, the portion of home refinance loans is well below the portion of owner-occupied units in these CTs. However, this is mitigated by the limited number of opportunities for home refinance loans given the low number of owner-occupied units in low-income CTs. The portion of loans made in moderate-income CTs is below the portion of owner-occupied units for the 2000-2002 reporting period, but nearly meets the demographics for the 2003 reporting period. The 2002 market share for home refinance loans in moderate-income CTs

nearly meets overall market share. The bank does not have a market share for loans made in low-income census tracts.

The geographic distribution of home refinance loans is adequate in the Las Vegas MSA. For the 2000-2002 reporting period, the portion of home refinance loans in low-income CTs is below the portion of owner-occupied units there. For the 2003 reporting period, the portion of loans exceeds the demographics. The portion of loans made in moderate-income CTs is significantly below the portion of owner-occupied units there for the 2000-2002 reporting period and below for the 2003 reporting period. The 2002 market share is below overall market share for loans made in moderate-income CTs. The bank does not have a market share for loans made in low-income CTs. Both market share for loans made in moderate-income CTs and overall market share are significantly below 1%.

Lending Gap Analysis

Analysis of the bank's overall lending activity did not reveal any conspicuous or unexplainable lending gaps within the full-scope AAs.

Inside/Outside Ratio

A majority of the bank's loans were originated within the bank's AAs. During the 2000-2002 reporting period, 79% of the HMDA loans were originated within its AAs. During the 2003 reporting period, 82% of the HMDA loans and 92% of the small loans to businesses were originated within the bank's AAs. (These percentages are calculated on a bank-wide basis. Furthermore, this information includes bank originations and purchases only and does not include extensions of credit by affiliates.)

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses for the 2003 reporting period.

The geographic distribution of small loans to businesses in both full scope AAs is excellent. In the Reno MSA, the portion of small loans to businesses exceeds the portion of businesses located in low-income CTs, and nearly meets the portion of businesses located in moderate-income CTs. In the Las Vegas MSA, the portion of small loans to businesses made in both LMI CTs significantly exceeds the portion of businesses located in those geographies. Since the bank was not required to collect data for small loans to businesses prior to 2003, no market share data is currently available.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of the bank's HMDA loans reflects adequate distribution of loans among borrowers of various income levels in both the Reno and Las Vegas MSAs. We arrived at this conclusion after considering the portion of low-income families who could reasonably be expected to afford a home mortgage loan. (The portion of low-income families in each full-scope AA was reduced by the portion of families living below the poverty level to arrive at the portion of families that could reasonably be expected to afford a home mortgage

loan. In the Reno MSA, 6% of the families during the 2000-2002 reporting period and 7% during the 2003 reporting period had incomes below the poverty level. In the Las Vegas MSA, 8% of the families during both reporting periods had incomes below the poverty level.) Distribution of small loans to businesses is adequate in both full-scope AAs.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases for the 2000-2002 and the 2003 reporting periods.

Borrower distribution of all home mortgage loan products combined is adequate in both the Reno and Las Vegas MSAs.

Home purchase borrower distribution in the Reno MSA is good. The portion of loans made to low-income borrowers is below the portion of families who could reasonably be expected to afford a home purchase loan for both the 2000-2002 and the 2003 reporting periods. The portion of loans made to moderate-income borrowers significantly exceeds the portion of families defined as such for both reporting periods. The 2002 market share is below overall market share for loans to low-income borrowers, but exceeds overall market share for loans to moderate-income borrowers.

Home purchase borrower distribution in the Las Vegas MSA is adequate. The portion of loans made to low-income borrowers in both the 2000-2002 and the 2003 reporting periods is below the portion of families who could reasonably be expected to afford a home purchase loan. The portion of loans made to moderate-income borrowers nearly meets the portion of families defined as such for both reporting periods. The 2002 market share is below the overall market share for loans to low-income borrowers and meets overall market share for loans to moderate-income borrowers. However, the overall market share and the market share for loans to LMI borrowers are all significantly below 1%.

An analysis of the borrower distribution of home improvement loans in the Reno and Las Vegas MSAs is not meaningful due to the small number of loans the bank originated during both review periods. See geographic distribution of home improvement loans for additional detail.

The borrower distribution for home refinance loans in the Reno MSA is good. The portion of loans to low-income borrowers is below the portion of families who could reasonably be expected to own a home for both the 2000-2002 and the 2003 reporting periods. The portion of home refinance loans to moderate-income borrowers exceeds the portion of borrowers defined as such for both the 2000-2002 and the 2003 reporting periods. The 2002 market share data indicates that market share of loans to LMI borrowers exceeds overall market share.

The borrower distribution for home refinance loans in the Las Vegas MSA is adequate. The portion of home refinance loans made to low-income borrowers is below the portion of families who could reasonably be expected to own a home for the 2000-2002 reporting period and exceeds the portion of families defined as such in the 2003 reporting period. The portion of loans made to moderate-income borrowers is below the portion of families defined as such for

the 2000-2002 reporting period, and exceeds the portion of families defined as such for the 2003 reporting period. The 2002 market share of loans to low-income borrowers exceeds overall market share and is below overall market share for loans to moderate-income borrowers. However, the overall market share and the market share for loans to LMI borrowers are all well below 1%.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses for the 2003 reporting period.

The borrower distribution of small loans to businesses in both full-scope AAs is adequate. The 2003 data indicates that the portion of loans made to small businesses (businesses with annual revenues of \$1 million or less) is below the portion of businesses defined as such in the Reno and Las Vegas MSAs. 2003 market share data is not currently available.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. Please note that Table 5 is excluded because the bank did not report any multifamily loans.

Community development lending is adequate and had a neutral impact on the bank's lending test rating. The bank made one community development loan totaling \$1.3 million in the Reno MSA during the review period. The loan is for a supermarket and dollar store, and will help stabilize and revitalize a blighted area by renovating an abandoned building and providing jobs for local LMI residents. The bank also made a small business loan totaling \$272 thousand in the Las Vegas MSA that has a community development purpose because it helped stabilize a moderate-income area.

During the review period, FNBNV originated a community development loan (noted above) that is considered to be complex because the bank had no historic income or experience with the proposed type of venture in the Reno AA. This required additional expertise and time to set up the loan.

Product Innovation and Flexibility

The bank did not offer any innovative or flexible loan products during this review period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Carson City non-MSA AA is consistent with the bank's overall "Low Satisfactory" rating performance under the lending test. Refer to the Tables 1 through 11 of appendix C for the 2000-2002 and the 2003 reporting periods, 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 is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Las Vegas and Reno MSAs is adequate. Refer to Table 13 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

In determining our conclusions under the Investment Test, consideration was given to when these investments were purchased. For most of the review period, the bank had limited investments in the Reno MSA and no investments in the Las Vegas MSA. We also considered the availability of qualified investment opportunities in the AA. For additional information regarding opportunities, please see the Reno and Las Vegas MSA market profiles in appendix B.

In the Reno MSA, qualified investments and grants total \$764 thousand. This amount represents all current period investments, and there are no prior period investments. The substantial majority of these investments, \$759 thousand or 99%, consists of recently purchased mortgage-backed securities targeted to low-and-moderate income borrowers both for the purchase and refinance of residential real estate. The \$5 thousand in donations was to agencies that primarily serve LMI individuals and families.

In the Las Vegas MSA, qualified investments total \$2.4 million. This amount represents all current period investments. The entire amount or 100%, of the investments in this MSA consist of recently purchased mortgage-backed securities targeted to LMI borrowers both for purchase and refinance of residential real estate.

None of the investments was considered innovative or complex.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Carson City non-MSA AA is consistent with the bank's overall performance. This current period investment consisted of \$354 thousand in recently purchased mortgage-backed securities targeted to LMI borrowers for the purchase and refinance of residential real estate. Refer to Table 13 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Reno MSA and the Las Vegas MSA is good. Refer to Table 14 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

FNBNV's branch delivery system is accessible to geographies and individuals of different income levels in both of the bank's full-scope AAs.

The bank's branch delivery system in the Reno MSA provides good accessibility to geographies and individuals of different income levels. The distribution of branches located in moderate-income CTs is excellent; both of the bank's branches are located in moderate-income CTs. During the evaluation period, the bank opened three branches, two in moderate-income CTs and one in an upper-income CT. The full service branch, located in the upper-income CT, closed and converted to a mortgage loan office with a full service ATM and night depository. The branch was located in the same department store chain as the Las Vegas branches and converted for the same reasons discussed below.

FNBNV's branch delivery system in the Las Vegas MSA provides good accessibility to geographies and individuals of different income levels. The distribution of branches in moderate-income CTs is excellent. Although the bank does not have any branches in low-income CTs, one branch is near a low-income CT. During the evaluation period, the bank opened eleven branches and closed five, leaving a total of six open branches in the Las Vegas MSA. Three of the branches are located in moderate-income CTs, with one also near a low-income CT. Of the three branches located in the upper-income CTs, one is adjacent to a moderate-income CT. During 2003, the bank closed three full service branches located in a national department store chain and converted them to mortgage loan production offices with a full service ATM and night depository. After careful analysis, the bank decided to close those branches, one each in a moderate, middle, and upper-income CT, due to lack of profitability, lackluster deposit generation, and poor cooperation of the location host. The two other branch closures in 2002 resulted from consolidating smaller offices into larger facilities that would provide for growth and additional services. The closures did not significantly impact LMI individuals or geographies.

For both the Reno and Las Vegas MSAs the distribution of ATMs, currently provides good access to all CTs and individuals of different income levels. The bank also has an agreement with a large nationwide banking company that FNBAZ customers can use approximately 13 ATMs in the Reno MSA and 25 ATMs in the Las Vegas MSA at no cost. These ATMs are located throughout the AAs including LMI geographies. All ATMs have the option of displaying information in either English or Spanish.

Banking hours and services do not vary significantly. Hours of operation for those branches in or near low- or moderate-income geographies are comparable to those offered at other branch locations.

Other alternative delivery systems offered by FNBNV include telephone banking and electronic banking, which allows customers access to deposit and loan accounts and other services through the Internet and online business banking. The bank also offers low-cost checking accounts, including a free checking account, which requires \$100 to open with no minimum daily balance required or monthly maintenance fee. In addition, customers receive a free ATM/Visa Check Card, free online banking, free online bill pay, and free access to network ATMs nationwide. However, we could not place significant weight on the alternative delivery

systems when drawing our CRA conclusions because no data was available to demonstrate that they were effective for delivering retail banking services in LMI geographies and to LMI individuals.

The bank provides Spanish-speaking employees at the mortgage loan and retail services call centers. There are four employees for each call center, and one employee at each call center can assist Spanish-speaking customers. Additionally, there are numerous branch and lending employees throughout the bank that also can provide assistance to Spanish-speaking clients.

Community Development Services

FNB Nevada provided a good level of community development services in the Reno and Las Vegas MSAs.

In the Reno MSA, bank staff provided their financial expertise to five different organizations that promote community development initiatives. A bank officer serves as a board member to a non-profit organization that promotes affordable housing by helping LMI individuals and families understand the home ownership responsibilities, secure low cost financing and build a starter home. Other bank officers serve as board members or in a financial literacy capacity for four various non-profit community-based organizations that benefit LMI students, women and families.

Bank staff provided financial and/or technical expertise to three different organizations that promote community development initiatives in the Las Vegas MSA. Bank staff provided their financial expertise to local hotel and casino employees, logging in 333 hours of home-buying and banking seminars during 2003 and year-to-date 2004. These seminars are held on location at the request of the hotels and casinos. The seminars target LMI hotel and casino employees and cover topics such as: first time home buyers, no money down programs, less than perfect credit, low interest rate programs and direct deposit programs. A separate seminar relating to affordable housing was held for local realtors dealing with the subject of understanding credit reports and how to help clients repair their credit. This seminar also covered first time homebuyer programs. In addition, a bank employee provided financial expertise by serving as a board member for a local non-profit that works with school aged children and also taught financial literacy to elementary school students from LMI families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Carson City non-MSA AA is weaker than the bank's overall performance. Performance is weaker due to the branch distribution in this AA; there is only one branch and it is located in a middle-income geography. This does not substantially impact the overall performance rating under the Service Test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

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 non-metropolitan 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): Investment and Service Tests and CD Loans:	01/01/00 to 12/31/03 01/01/98 to 06/01/04
Financial Institution		Products Reviewed
FNB NV, Reno, NV		Home purchase, home improvement, home refinance, small business, and community development loans. Community development investments and services.
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Las Vegas MSA #4120 Reno MSA #6720 Carson City Non-MSA #9999	Full-Scope Full-Scope Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Las Vegas MSA (Clark County)	B-2
Reno MSA.....	B-4

Las Vegas Metropolitan Statistical Area

Demographic Information for Full-Scope Area: Las Vegas MSA (Clark County)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	345	1.45	19.42	40.29	37.68	1.16
Population by Geography	1,375,765	1.36	24.62	39.67	34.35	0.00
Owner-Occupied Housing by Geography	302,842	0.26	13.47	40.02	46.25	0.00
Businesses by Geography	108,144	6.42	20.22	35.80	36.94	0.61
Farms by Geography	1,474	3.26	15.26	40.50	40.98	0.00
Family Distribution by Income Level	342,405	17.47	17.88	22.95	41.70	0.00
Distribution of LMI Families throughout AA Geographies	121,015	2.32	36.67	41.19	19.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below the Poverty Level	= \$48,420 = \$54,700 = 9.85%	Median Housing Value Unemployment Rate		\$125,700 3.21%		

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

Source: 2000 U.S. Census, and 2003 HUD updated MFI.

Clark County in the Las Vegas MSA is one of FNBNV's primary AAs. This AA accounts for 71% of the bank's deposits, and 12% of the bank's loans for the 2000-2002 reporting period and 23% for the 2003 reporting period. Two-thirds of the bank's branches are located in this AA.

The 2000 U.S. Census Data indicates that the AA consists of 345 CTs and includes the cities of Las Vegas, North Las Vegas, Boulder City, Henderson, Laughlin, and Mesquite. The AA has experienced phenomenal growth over the past decade. The Las Vegas-based Metropolitan Research Organization (MRA) estimates that over 5000 people move to Southern Nevada each month.

Demographic data indicates the population of Clark County nearly doubled and the number of census tracts nearly tripled over the past decade from the 125 CTs noted in the 1990 census data. Significant growth occurred in the number of moderate-, middle-, and upper-income census tracts. The Las Vegas 2002 Master Plan, developed by the City of Las Vegas, notes that growth has largely taken place in outlying areas primarily in the form of isolated, gated communities. Downtown areas have experienced deterioration, disinvestment, and higher vacancy rates. Low-income CTs declined slightly in census year 2000 and represent 2% of all tracts as compared to 6% in census year 1990. Moderate-income CTs increased significantly in number from 22 in 1990 to 79 in 2000 and represent 18% and 22% respectively for each census year. The most significant increase in the number of CTs occurred in middle and upper income CTs. Middle-income CTs increased from 60, or 48% of total CTs, in 1990 to 147, or 43%, in 2000; upper-income CTs increased from 35, or 28% of total CTs, in 1990 to 109, or 32%, in 2000. The percentage of families below the poverty level in the Las Vegas AA

was at 7.54% in 1990 and increased only slightly to 7.85% in 2000. A review of the census data for both years indicates that in low-income CTs, there were 1,475 owner-occupied units in 1990 and 848 owner-occupied units in 2000; thereby limiting opportunities for home mortgage loans in these tracts. Opportunities in moderate-income CTs are significantly more abundant with 14,338 owner-occupied units reported in the 1990 census data and 49,756 reported in the 2000 census data.

Las Vegas is a major gaming, convention, and resort destination for domestic and foreign visitors. Major employers include hotels, gaming, and service-related industries. Government, retail trades, mining, manufacturing, and agriculture are among the most significant employers. However, the Las Vegas MSA and the entire state of Nevada are still dominated completely by the gaming and tourist industry.

The 2002 HUD estimated median family income in Las Vegas was \$54,700. The unemployment rate in Las Vegas as of May 2004 was 3.7%. Despite the fact that the region has managed to avoid the degree of economic hardship faced elsewhere, some residents have suffered unemployment or reduction in income.

New businesses continue to move to the AA in record numbers. The favorable tax structure, abundant labor force, close proximity to major western markets, and overall lifestyle that the area offers all contribute to the attraction of new businesses. The AA has just over 108,000 small businesses; more than half of those have revenues of less than \$1 million. The businesses are primarily retail and service businesses with specialized financial needs.

Community contacts indicate there is a need to provide capital to start a business or to buy business real estate. There is also a need for financial institutions to provide funding for programs that benefit LMI groups, specifically programs that provide home buyer education and job training for skilled occupations. (There is an abundance of jobs for “unskilled” workers, but many offer low wages and no health insurance.) And there is a need for financing for affordable housing, including flexible affordable housing loans for LMI individuals and funding for multi-family units. Las Vegas has a critical shortage of affordable housing units; and the local government does not sponsor substantial community development programs to further encourage housing development. The rapid influx of people has aggravated the problem. Housing prices and rents have increased faster than income levels. Although there has been significant job growth, most of these jobs are in the service or retail sectors and offer lower pay, often without benefits. The city has a large volume of substandard housing. Estimates are that there are 17 thousand substandard rental units in Las Vegas. The large transient population has created a significant need for affordable rental units. The median home price has increased to more than \$180,000, which makes it difficult for LMI individuals who desire to own a home to meet the guidelines for home ownership. A large population of homeless people, many with chemical dependencies, also puts pressure on city housing resources. This all presents a challenge to community development organizations that work to provide affordable housing and increase homeownership among LMI populations.

The environment in this AA is highly competitive. The most significant competition consists of large nation-wide banks such as Bank of America, Wells Fargo, and Citibank. In mortgage lending, FNBNV identified its primary competitors as Wells Fargo, Bank of America, Countrywide, and Washington Mutual. In commercial lending, the most significant competitors are Colonial Bank, Nevada State Bank, Bank West, and Key Bank.

Reno Metropolitan Statistical Area

Demographic Information for Full-Scope Area: Reno MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	2.99	26.87	37.31	32.84	0.00
Population by Geography	339,486	3.65	29.63	39.48	27.25	0.00
Owner-Occupied Housing by Geography	78,318	0.99	16.60	43.47	38.95	0.00
Businesses by Geography	39,140	4.34	50.05	28.59	17.03	0.00
Farms by Geography	481	3.33	31.81	35.97	28.90	0.00
Family Distribution by Income Level	84,518	18.99	18.69	23.04	39.28	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	31,847	6.10	41.23	37.68	14.99	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below the Poverty Level	= \$54,283 = \$62,100 = 9.11%	Median Housing Value Unemployment Rate				\$149,500 2.64%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2003 HUD updated MFI.

The Reno MSA is one of the bank's two primary AA. This AA accounts for the highest volume of loans – 73% during the 2000-2002 reporting period and 67% during the 2003 reporting. This AA also accounts for 22% of the bank's deposits and one-fourth of the bank's branches.

Based on 2000 U.S. census data, the Reno MSA consists of 67 CTs. This is a slight increase from the 58 CTs reported in the 1990 census data. Most of the increase reported in the 2000 census data occurred in upper-income CTs (9) with almost a proportionate decrease in the number of CTs (10) with no income level assigned in the 1990 census data. The percentage of families living below the poverty level increased only slightly from 6.26% reported in the 1990 census data to 6.66% reported in the 2000 census data. A review of the census data for both years indicates that in low-income CTs, there were only 22 owner-occupied units in 1990 and 775 owner-occupied units in 2000; thereby limiting opportunities for home mortgage loans in these tracts. Opportunities are more abundant in moderate-income CTs with 10,081 owner occupied units reported in the 1990 census data and 13,000 reported in the 2000 census data.

The AA consists of all of Washoe County, located in the northwest portion of the state, bordering the state of California. Reno is also a world-famous tourist area known for legalized gambling, entertainment industries, and access to the scenic Lake Tahoe recreation area.

Community contacts indicate there are many opportunities to participate in various forms of community development initiatives in the city of Reno and throughout greater Washoe County. There is a need for individuals to provide homebuyer education and to provide expertise by serving on boards and committees of community development organizations. There is a need for small loans to businesses. And there is a need for banks to provide loans and investments that support affordable and flexible home mortgage loans for LMI individuals, as well as

funding for multi-family units. Washoe County has a Home Consortium that has been certified through HUD. The consortium is able to use state and federal money to develop affordable housing. During the first four years of operation, the Home Consortium produced over 1400 multi-family housing units. Along with other affordable housing programs, the Washoe County Human Services Consortium provides funds to service providers of emergency rental assistance. The Washoe County Comprehensive Plan lists several development regulations that relate directly to affordable housing and states that the county will work with public and private entities toward providing affordable housing. The county has a Department of Community Development that, among other things, will work with owners of land designated for multi-family housing units. The Reno Housing Authority serves Reno, Sparks, and the unincorporated portions of Washoe County. This agency focuses on public housing and Section 8 housing.

The Washoe County Affordable Housing Study found that the demand for housing to low-income households exceeds the supply. The study stated that by 2015, unincorporated Washoe County will need over 3,000 more housing units for households earning less than 80% of median income. The county will also need an additional 2,700 units for households earning between 80-110% of median income. The Housing Study identified twelve areas that relate to housing needs. Several of them specifically include reference to encouraging local lenders and financial institutions to make investments in or provide capital for affordable housing. This Housing Study illustrates some of the opportunities available for financial institutions to address affordable housing needs.

HUD reports that rural housing needs outside of the city of Reno include a reduction of overcrowded households, improvement of plumbing and structural problems, and improved weatherization. As in Las Vegas, there is also a high level of homelessness.

The environment in the Reno MSA is competitive. The bank's general competitors include such nation-wide banks as Bank of America, Wells Fargo, and Citibank. The bank's mortgage lending competitors include Wells Fargo, Bank of America, Countrywide, and Washington Mutual. In commercial lending, the bank's competitors include Nevada State Bank, First Independent Bank, and U.S. Bank.

Appendix C: Tables of Performance Data

Content of Standardized 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: 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/AA. Tables without data are not included in this PE. This includes tables 5, 6, 7, 11, and 12 for 2001/2002 and tables 5, 7, and 12 for 2003.

The following is a listing and brief description of the tables:

- 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/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 in *OCC Bulletin 99-22* dated June 3, 1999, for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- 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 AA.
- 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/AA. 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. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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.

Table 14. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

Lending Volume		Geography: Nevada						Evaluation Period: January 1, 2000 to December 31, 2002				
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:												
Las Vegas (Clark County MSA)	12.03	362	57,325	0	0	0	0	0	0	362	57,325	71.48
Reno MSA	72.56	2,184	310,533	0	0	0	0	1	1,360	2,185	311,893	21.92
Limited Review:												
Carson City Non-MSA	15.42	464	61,292	0	0	0	0	0	0	464	61,292	6.60

* Loan Data for the period of January 1, 2000 through December 31, 2002. Rated area refers to either the state or multi-state MSA rating area.

** The evaluation period for Community Development Loans is December 1, 1997, to June 1, 2004.

*** Deposit Data as of September 30, 2003. Rated Area refers to the state, multi-state MSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase			Geography: Nevada						Evaluation Period: January 1, 2000 to December 31, 2002						
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County MSA)	182	11.02	0.99	1.65	7.93	1.10	47.26	31.87	43.83	65.38	0.13	1.03	0.04	0.11	0.15
Reno MSA	1,225	74.20	0.04	0.00	18.19	14.69	46.50	54.69	35.28	30.61	3.45	0.00	4.84	3.51	2.93
Limited Review:															
Carson City Non-MSA	244	14.78	0.00	0.00	0.82	1.64	85.27	86.89	13.90	11.48	5.49	0.00	25.00	5.62	3.64

* Based on 2002 US Peer Mortgage Data.

** Home purchase loans originated and purchased in the MSA/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 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement			Geography: Nevada								Evaluation Period: January 1, 2000 to December 31, 2002				
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	4	8.70	0.99	0.00	7.93	0.00	47.26	0.00	43.83	100.00	0.09	0.00	0.00	0.00	0.13
Reno MSA	40	86.96	0.04	0.00	18.19	15.00	46.50	62.50	35.28	22.50	6.16	0.00	6.38	7.04	4.40
Limited Review:															
Carson City Non-MSA	2	4.35	0.00	0.00	0.82	0.00	85.27	100.00	13.90	0.00	3.03	0.00	0.00	3.70	0.00

* Based on 2002 US Peer Mortgage Data.

** Home improvement loans originated and purchased in the MSA/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 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance			Geography: Nevada								Evaluation Period: January 1, 2000 to December 31, 2002				
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	176	13.40	0.99	0.57	7.93	2.84	47.26	21.59	43.83	75.00	0.15	0.00	0.10	0.10	0.18
Reno MSA	919	69.99	0.04	0.00	18.19	10.12	46.50	50.16	35.28	39.72	2.33	0.00	2.17	2.46	2.22
Limited Review:															
Carson City Non-MSA	218	16.60	0.00	0.00	0.82	0.00	85.27	84.86	13.90	15.14	3.56	0.00	0.00	3.76	2.81

* Based on 2002 US Peer Mortgage Data.

** Home mortgage refinance loans originated and purchased in the MSA/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 1990 Census information.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase			Geography: Nevada						Evaluation Period: January 1, 2000 to December 31, 2002						
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	182	11.02	17.36	4.92	18.29	18.03	23.35	33.61	41.00	43.44	0.11	0.09	0.11	0.12	0.11
Reno MSA	1,225	74.20	17.38	6.17	19.05	30.58	25.18	31.75	38.39	31.50	3.89	3.04	4.73	4.49	3.12
Limited Review:															
Carson City Non-MSA	244	14.78	16.61	11.62	17.63	20.75	26.41	31.12	39.35	36.51	6.17	10.26	7.19	6.39	4.90

* Based on 2002 US Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 5.3% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement			Geography: Nevada								Evaluation Period: January 1, 2000 to December 31, 2002				
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	4	8.70	17.36	0.00	18.29	0.00	23.35	75.00	41.00	25.00	0.09	0.00	0.00	0.32	0.00
Reno MSA	40	86.96	17.38	5.00	19.05	27.50	25.18	45.00	38.39	22.50	6.41	3.45	6.75	9.18	3.98
Limited Review:															
Carson City Non-MSA	2	4.35	16.61	0.00	17.63	0.00	26.41	100.00	39.35	0.00	3.28	0.00	0.00	8.00	0.00

* Based on 2002 US Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 0.00 of loans originated and purchased by Bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance			Geography: Nevada						Evaluation Period: January 1, 2000 to December 31, 2002						
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	176	13.40	17.36	8.63	18.29	15.11	23.35	34.53	41.00	41.73	0.17	0.34	0.14	0.22	0.13
Reno MSA	919	69.99	17.38	7.31	19.05	22.70	25.18	29.00	38.39	40.98	2.63	2.82	3.49	2.86	2.14
Limited Review:															
Carson City Non-MSA	218	16.60	16.61	4.39	17.63	26.34	26.41	27.32	39.35	41.95	3.95	2.38	5.25	3.74	3.73

* Based on 2002 US Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 1990 Census information.

**** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 13. Qualified Investments

Qualified Investments		Geography: Nevada				Evaluation Period: January 1, 1998, to June 1, 2004				
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:										
Las Vegas (Clark County) MSA	0	0	5	2,360	5	2,360	67.85	0	0	
Reno MSA	0	0	5	764	5	764	21.97	0	0	
Limited Review:										
Carson City Non-MSA	0	0	2	354	2	354	10.18	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 14. Distribution of Branch Delivery System and Branch Openings/Closings

Distribution of Branch Delivery System and Branch Openings/Closings				Geography: Nevada				Evaluation Period: January 1, 1998, to June 1, 2004									
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:																	
Las Vegas (Clark County) MSA	71.48	6	66.67	0	50.00	0	50.00	11	5	0	3	0	3	1.36	24.62	39.67	34.35
Reno MSA	21.92	2	22.22	0	100.00	0	0	3	1	0	2	0	0	3.65	29.63	39.48	27.25
Limited Review:																	
Carson City Non-MSA	6.60	1	11.11	0	0	100.00	0	1	0	0	0	1	0	0.00	36.50	56.59	6.91

Table 1. Lending Volume

Lending Volume		Geography: Nevada						Evaluation Period: January 1, 2003 to December 31, 2003				
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:												
Las Vegas (Clark County) MSA	22.82	285	49,369	122	27,436	0	0	0	0	407	76,805	71.48
Reno MSA	66.72	1,136	181,628	56	9,490	0	0	1	1,360	1,193	192,478	21.92
Limited Review:												
Carson City Non-MSA	10.46	187	27,533	0	0	0	0	0	0	187	27,533	6.60

* Loan Data for 2003. Rated area refers to either the state or multi-state MSA rating area.

** The evaluation period for Community Development Loans is December 31, 1997, to June 1, 2004.

*** Deposit Data as of September 30, 2003. Rated Area refers to the state, multi-state MSA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Nevada								Evaluation Period: January 1, 2003 to December 31, 2003					
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	160	23.26	0.26	0.00	13.47	15.00	40.02	16.25	46.25	68.75	NA	NA	NA	NA	NA
Reno MSA	464	67.44	0.99	0.22	16.60	14.87	43.47	51.08	38.95	33.84	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	64	9.30	0.00	0.00	31.34	35.94	59.40	59.38	9.26	4.69	NA	NA	NA	NA	NA

* 2003 US Peer Mortgage Data is currently not available.

** Home purchase loans originated and purchased in the MSA/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.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement			Geography: Nevada								Evaluation Period: January 1, 2003 to December 31, 2003				
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	1	14.29	0.26	0.00	13.47	0.00	40.02	0.00	46.25	100.00	NA	NA	NA	NA	NA
Reno MSA	6	85.71	0.99	0.00	16.60	0.00	43.47	50.00	38.95	50.00	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	0	0.00	0.00	0.00	31.34	0.00	59.40	0.00	9.26	0.00	NA	NA	NA	NA	NA

* 2003 US Peer Mortgage Data is currently not available.

** Home improvement loans originated and purchased in the MSA/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.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance			Geography: Nevada								Evaluation Period: January 1, 2003 to December 31, 2003				
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	124	13.58	0.26	0.81	13.47	7.26	40.02	29.03	46.25	62.90	NA	NA	NA	NA	NA
Reno MSA	666	72.95	0.99	0.30	16.60	15.77	43.47	44.59	38.95	39.34	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	123	13.47	0.00	0.00	31.34	28.46	59.40	66.67	9.26	4.88	NA	NA	NA	NA	NA

* 2003 US Peer Mortgage Data is currently not available.

** Home mortgage refinance loans originated and purchased in the MSA/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.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses			Geography: Nevada						Evaluation Period: January 1, 2003 to December 31, 2003						
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	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	122	68.54	6.42	14.75	20.22	24.59	35.80	13.93	36.94	45.90	NA	NA	NA	NA	NA
Reno MSA	56	31.46	4.34	7.14	50.05	48.21	28.59	23.21	17.03	21.43	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	0	0.00	0.00	0.00	39.38	0.00	59.75	0.00	0.87	0.00	NA	NA	NA	NA	NA

* 2003 US Peer Mortgage Data is currently not available

** Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2003.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Nevada								Evaluation Period: January 1, 2003 to December 31, 2003					
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	160	23.26	17.47	4.26	17.88	17.73	22.95	26.24	41.70	51.77	NA	NA	NA	NA	NA
Reno MSA	464	67.44	18.99	8.00	18.69	24.67	23.04	34.89	39.28	32.44	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	64	9.30	19.06	0.00	19.06	9.68	22.42	37.10	39.46	53.23	NA	NA	NA	NA	NA

* 2003 Peer Mortgage Data is currently not available.

** As a percentage of loans with borrower income information available. No information was available for 5.15% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement			Geography: Nevada						Evaluation Period: January 1, 2003 to December 31, 2003						
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	1	14.29	17.47	0.00	17.88	0.00	22.95	100.00	41.70	0.00	NA	NA	NA	NA	NA
Reno MSA	6	85.71	18.99	0.00	18.69	20.00	23.04	60.00	39.28	20.00	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	0	0.00	19.06	0.00	19.06	0.00	22.42	0.00	39.46	0.00	NA	NA	NA	NA	NA

* 2003 Peer Mortgage Data is currently not available.

** As a percentage of loans with borrower income information available. No information was available for 14.3% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Nevada								Evaluation Period: January 1, 2003 to December 31, 2003					
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 ****	Over All	Low	Mod	Mid	Upp
Full Review:															
Las Vegas (Clark County) MSA	124	13.58	17.47	9.82	17.88	19.64	22.95	30.36	41.70	40.18	NA	NA	NA	NA	NA
Reno MSA	666	72.95	18.99	5.92	18.69	20.96	23.04	27.52	39.28	45.60	NA	NA	NA	NA	NA
Limited Review:															
Carson City Non-MSA	123	13.47	19.06	3.51	19.06	21.05	22.42	28.95	39.46	46.49	NA	NA	NA	NA	NA

* 2003 Peer Mortgage Data is currently not available.

** As a percentage of loans with borrower income information available. No information was available for 6.8% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 2000 Census information.

**** Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans To Businesses			Geography: Nevada			Evaluation Period: January 1, 2003 to December 31, 2003			
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:									
Las Vegas (Clark County) MSA	122	68.54	53.18	42.62	47.54	22.13	30.33	NA	NA
Reno MSA	56	31.46	55.97	46.43	51.79	26.79	21.43	NA	NA
Limited Review:									
Carson City Non-MSA	0	0.00	41.99	0.00	0.00	0.00	0.00	NA	NA

* 2003 Peer Mortgage Data is currently not available.

** Small loans to businesses originated and purchased in the MSA/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 -2003).

**** 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 1.69% of small loans to businesses originated and purchased by the Bank.

Table 13. Qualified Investments

Qualified Investments		Geography: Nevada				Evaluation Period: January 1, 1998, to June 1, 2004			
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:									
Las Vegas (Clark County) MSA	0	0	5	2,360	5	2,360	67.85	0	0
Reno MSA	0	0	5	764	5	764	21.97	0	0
Limited Review:									
Carson City Non-MSA	0	0	2	354	2	354	10.18	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 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSING								Geography: Nevada				Evaluation Period: January 1, 1998, to June 1, 2004					
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:																	
Las Vegas (Clark County) MSA	71.48	6	66.67	0	50.00	0	50.00	11	5	0	3	0	3	1.36	24.62	39.67	34.35
Reno MSA	21.92	2	22.22	0	100.00	0	0	3	1	0	2	0	0	3.65	29.63	39.48	27.25
Limited Review:																	
Carson City Non-MSA	6.60	1	11.11	0	0	100.00	0	1	0	0	0	1	0	0.00	36.50	56.59	6.91

