



Public Disclosure

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Community Reinvestment Act Performance Evaluation

Citibank (Nevada), N.A.
Charter Number: 20484
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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Citibank (Nevada), N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 29, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

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 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, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase

of manufactured homes and refinancings of home improvement and home purchase loans.

Income Levels - These relate to individuals, families, households, or the census tracts in an MSA.

Low-Income - Income levels that are less than 50% of the median family income.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Upper-Income - Income levels that are 120% or more of the MFI.

Median Family Income (MFI) - The median income determined by the United States 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) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **“Outstanding.”**

The following table indicates the performance level of **Citibank (Nevada), N.A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Citibank (Nevada), N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
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 excellent level of home improvement and community development lending;
- < the excellent distribution of home mortgage loans in low- and moderate-income (LMI) geographies and to LMI borrowers;
- < an excellent level of community development investments, which is significantly better than peer, and has increased 12 times since the prior evaluation;
- < delivery systems which are accessible to geographies and individuals of different income levels in the assessment area; and
- < an excellent record of community development services.

Description of Institution

Citibank (Nevada), N.A. (Citibank) is one of several banking subsidiaries of Citigroup, Inc. The other banking subsidiaries are Citibank, N.A.; Citibank (South Dakota), N.A.; Citibank (New York State); Citibank (Delaware); Citibank, FSB; Citicorp Trust, N.A. (Florida); Citicorp Trust, N.A.; Universal Bank, N.A.; Universal Financial Services Corp.; Travelers Bank, USA; and, Travelers Bank and Trust, FSB. Citigroup is the largest financial services company in the world. In addition to its banking services, it offers insurance, securities brokerage, and investment banking products.

Citicorp chartered Citibank in 1985, soon after the Nevada legislature enacted legislation to permit out of state banking companies to charter banks within the state. The bank is a unique organization that consists of both a large credit card operations center and a smaller retail banking operation. This "hybrid" organization has elements of a limited purpose bank because of the large credit card center and a small retail bank because of its branch network.

As of December 31, 1998, Citibank had \$9 billion in assets and \$7.7 billion of loans. Credit card receivables account for \$7.6 billion of the loans, and the remainder consists of less than \$100 million of home mortgage and consumer loans. Many of the bank's loans are securitized and sold in the secondary markets. Citibank has a small retail banking presence in its market area. The bank has \$400 million in local deposits, of which \$375 million are consumer deposits. Citibank ranks sixth in deposit size, with a market share of 4 percent of the total deposits in Clark County. The bank's business focus does not include small business lending, which is offered only as an accommodation to the bank's retail customers. The small business loan market is adequately served by other local banks. Citibank has 2 percent of the market for these loans, which is commensurate with its market presence. Citibank does not offer small farm loans.

Citigroup and its affiliates provide investment expertise and funding for CRA qualified loans and investments. Activities within the bank's assessment area of several of these affiliates were considered in the evaluation of Citibank's performance. For example, most of the home purchase lending in the market attributed to Citibank is done through an affiliate, Citicorp Mortgage, Inc. Refer to Appendix A for a listing of affiliates and products reviewed. There are no constraints, legal or financial, that affect the bank's ability to provide loans, investments, or services in its assessment area.

The evaluation period for the Lending Test was January 1, 1997 through December 31, 1998. For the Service and Investment Test the evaluation period was from the date of the last public evaluation on May 7, 1997 through the beginning of this evaluation on March 29, 1999.

Description of Assessment Area

The bank's assessment area is metropolitan Las Vegas, which includes the cities of Las Vegas, North Las Vegas, Boulder City, and Henderson. The area includes 115 of the 120 census tracts in the Las Vegas MSA, which encompasses all of Clark County. The bank's assessment area does not include the smaller incorporated cities of Laughlin and Mesquite, and the county's rural areas. The five census tracts that are not in the bank's assessment area are middle-income tracts. Eighty-one percent of the population resides in middle- and upper-income census tracts.

Las Vegas is a major gaming, convention, and resort destination for domestic and foreign visitors. It has 13 of the 15 largest hotels in the country, as more than 30 million tourists visit the city each year. There are 113 thousand hotel rooms and occupancy rates are over 86 percent. The economic impact of tourism exceeds \$20 billion.

Las Vegas is one of the highest growth areas in the country. The population of Clark County has grown from 721 thousand in 1990 to 1.2 million in 1998, which represents 72 percent of the state's population. The economy has diversified as the service and construction sectors have expanded rapidly. The percentage of retirees has increased significantly as retired people have relocated to the area because of the weather and tax climate. During 1997 and 1998 more than 174 thousand people moved into Las Vegas, creating over 50,000 new households. Also, during this population increase, the number of households with incomes exceeding \$50,000 has become the largest segment of the population. Median values of housing have increased since 1990, but this is because more expensive homes have been built to accommodate the demand. However, the prices of the existing homes have remained stable during this expansion as the supply of new housing has met the market demands. The number of residential building permits is declining because of higher costs associated with land acquisition, construction, and utility connections. Commercial building permits are increasing.

Twenty-three financial institutions provide banking services in the area. A few large banks, including Bank of America, Norwest, Wells Fargo, and First Security, have a significant share of the local banking market.

Based on discussions with the bank and the community groups we met with during the examination, the identified credit needs of the community are in the areas of affordable housing and small business. Citibank has a small portfolio of small business loans, as most of the other banks in the assessment area serve that market. Citibank chose, instead, to focus on residential lending since there are

still many unmet home mortgage lending needs in the community. There are problems associated with developing affordable housing. The lending opportunities are limited because of several legal and political obstacles related to affordable housing development. These include legislative and zoning constraints, and an inadequate number of affordable housing developers. There is a very low incidence of owner-occupied housing in LMI census tracts, which increases the demand for multifamily housing. There are relatively few affordable housing developers. High land acquisition costs, strict zoning laws, and designated areas for casino related redevelopment are the main impediments to this type of development. Also, much of the lower wage population is transient in nature; this segment rents homes and resides in Las Vegas for relatively short periods of time. Given these opportunity limitations, Citibank responded to an identified need and has aggressively pursued home improvement loans in LMI census tracts and to LMI individuals.

Additional demographic information is contained in Appendix B.

Community Contacts

We reviewed community contact forms that representatives of the OCC, Federal Reserve Bank, Federal Deposit Insurance Corporation, and Office of Thrift Supervision had prepared. We also conducted outreach sessions with representatives of six community based organizations and local government. The issues identified by those groups parallel those identified by the bank: multi-family affordable housing issues, the need for infrastructure development within community based organizations, and small business access to capital and technical assistance. Community groups indicated that Citibank has been proactive in soliciting their input and feedback on various community development strategies. The opening of the bank's Community Lending Center (described on page 23) was received as a particularly positive development.

Fair Lending Review

We conducted a fair lending examination of home purchase mortgage loans. Home purchase mortgages were selected by a random sample of Citicorp Mortgage's HMDA-LAR by the OCC's Economics and Policy Analysis Department. The prohibited basis selected for the sample was based on racial characteristics. The results of the examination did not indicate any acts of illegal discrimination. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified. The mortgage group's fair lending policies, procedures, training programs and internal assessment efforts are satisfactory.

Conclusions with Respect to Performance Tests

LENDING TEST

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The level of the bank's lending is good, considering the size of the retail operations and the complex nature of the bank's other operations. During this evaluation period, the bank made 2,588 home mortgage loans for a total of \$172.4 million. Of this total, 538 were home purchase loans totaling \$61.4 million; 1,245 were home improvement loans totaling \$4.3 million; 802 were home refinance loans totaling \$99.3 million, and 3 were multi-family loans totaling \$7.5 million. The bank also made 242 small business loans totaling \$20.6 million.

Citibank set aggressive goals for HMDA reportable lending in LMI geographies and to LMI individuals; its goals were exceeded in 1998. The volume of consumer home mortgage loans in 1997/1998 increased 67 percent over that in 1995/1996. The increase is reflected in all types of home mortgage loans. Home purchase loans increased 15 percent; home improvement loans increased 91 percent and home refinance loans increased 64 percent. As noted, the greatest increase is in home improvement loans; these represent almost half of all consumer home mortgage loan originations. The bank ascertained a specific credit need for home improvement loans in LMI areas and strongly marketed them. The number of home improvement loans increased from 57 in 1997 to 1,188 in 1998.

Citibank made loans in a substantial majority of the geographies in the assessment area. Lending trends are very positive. Ninety-four percent of all loans the bank originated are in the assessment area.

Distribution of Loans by Income Level of the Geography

Citibank's distribution of home mortgage lending reflects excellent penetration throughout the assessment area, including LMI census tracts. The distribution of small business lending is adequate. The bank's community development loan portfolio also provides support to the creation of affordable housing in LMI areas in the bank's assessment area. There are no conspicuous gaps in the bank's lending patterns.

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.

The bank's home mortgage lending in low-income census tracts is excellent and compares very favorably to demographics and to the aggregate market. Approximately 1 percent of the owner-occupied units are in low-income census tracts. The aggregate market originated less than 1 percent (four-tenths of one percent) of home purchase loans, 1 percent of home improvement loans, and 1 percent of home refinance loans in low-income census tracts. In comparison, Citibank originated 1 percent of its home purchase loans, 2 percent of its home improvement loans, and less than 1 percent of its home refinance loans in low-income geographies. The bank did make an effort to attract homeowners in low-income census tracts to apply for home refinance loans by sending out mass mailings to homeowners of residences in these census tracts. Although not as successful as Citibank had anticipated, the levels of lending were good considering that management discovered a significant number of the homeowners of single family residences in low-income census tracts do not even live in the state.

Distribution of home mortgage lending in moderate-income census tracts also compares very favorably to demographics and is significantly better than the aggregate market for home purchase and home improvement loans. Demographic data indicates 8 percent of the owner-occupied units are located in moderate-income census tracts. HMDA data indicates the aggregate market originated 6 percent of home purchase loans, 5 percent of home improvement loans, and 5 percent of home refinance loans in moderate-income census tracts. In comparison, Citibank originated 9 percent of the home purchase, 15 percent of the home improvement, and 3 percent of the home refinance loans in moderate-income census tracts. The three multifamily loans the bank made were in LMI geographies.

Market share data indicates the bank's share of home purchase and home improvement loans in LMI census tracts exceeds its overall market share; it is adequate for home refinance loans. For home purchase loans, the bank's overall market share is .50 percent. In comparison, the bank's market share is .40 percent in low-income census tracts, and .69 percent in moderate-income census tracts. For home improvement loans, the bank's overall market share is .59 percent. In comparison, the bank had a 1.03 percent market share for home improvement loans in moderate-income geographies (no loans were made in low-income geographies in 1997). The bank's overall market share for home refinance loans is 1.02 percent. In comparison, the bank's market share is .72 percent in

low-income census tracts and .94 percent in moderate-income census tracts.

Small Business Loans

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The bank's penetration of small business loans in LMI census tracts is adequate. Citibank offers small business loans only as an accommodation to its retail customers. The bank has a very small market share at only 2 percent. This is consistent with its business focus. The bank originated almost 3 percent of its loans in low-income census tracts; in comparison 5 percent of the businesses are located in low-income census tracts. The bank originated 6 percent of its small business loans in moderate-income census tracts; in comparison, 14 percent of the businesses are located in these census tracts.

Distribution of Loans by Income Level of the Borrower

Data indicates excellent distribution of home mortgage loans to LMI borrowers. The distribution of small business loans to businesses of different sizes and in lower amounts is adequate.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Although the distribution of HMDA reportable loans to low-income borrowers does not meet or exceed demographics, it exceeds the aggregate market. Demographic data indicates 18 percent of the families in the assessment area are low-income. However, the data also indicates 8 percent of the population have incomes below the poverty level. Further, the data indicates that in most LMI census tracts where a majority of the LMI population resides and where the bank concentrated its marketing efforts, the percentage of families below the poverty level is significantly higher than the overall average. In half of the LMI census tracts the percentage of families below the poverty level is between 20 and 37 percent, and in one it is as high as 57 percent. HMDA data indicates the aggregate market originated 6 percent of home purchase loans, 6 percent of home improvement loans, and 8 percent of home refinance loans to low-income borrowers. In comparison, Citibank originated 11 percent of its home purchase loans, 8 percent of its home improvement loans, and 9 percent of its home refinance loans to low-income borrowers. The distribution of HMDA loans to low-

income borrowers demonstrates significant efforts on management's part; management indicated it has been difficult to attract the low-income market due to the transient nature of a portion of the low-income population that is attracted to this gaming community.

The distribution of loans to moderate-income borrowers exceeds the distribution of families which are moderate-income and compares very favorably to the aggregate market. Demographic data indicates 18 percent of the families are moderate-income. HMDA data indicates the aggregate market originated 23 percent of home purchase loans, 18 percent of home improvement loans, and 19 percent of home refinance loans to moderate-income borrowers. In comparison, Citibank originated 40 percent of its home purchase loans, 16 percent of its home improvement loans, and 29 percent of its home refinance loans to moderate-income borrowers.

Market share data indicates the bank's share of all types of home mortgage loans to LMI borrowers significantly exceeds both its overall market share, and its market share to middle- and upper-income borrowers. For home purchase loans, Citibank's overall market share is .50 percent. In comparison, the bank's market share is 1.11 percent for home purchase loans to low-income borrowers, and 1.17 percent for home purchase loans to moderate-income borrowers. For home improvement loans, Citibank has an overall market share of .59 percent. In comparison, the bank's market share is .90 percent for home improvement loans to low-income borrowers, and .57 percent for moderate-income borrowers. For home mortgage refinance loans, Citibank's overall market share is 1.02 percent. In comparison, the bank's market share is 1.32 percent for home refinance loans to low-income borrowers, and 1.62 percent for moderate-income borrowers.

Small Business Loans

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

Small business lending to businesses of different sizes is adequate. The bank originated 34 percent of its business loans to small businesses with gross annual revenues of \$1 million or less. This compares satisfactorily to the market, which indicates that 43 percent of the aggregate small business loans were originated to small businesses. Loan data indicates a majority of the business loans were small, with an average loan size of \$82,000.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

Citibank's level of community development lending is good, and compares favorably to its peers. All of the community development loans benefited the assessment area or a larger statewide area which includes the assessment area where 72 percent of the state's population resides.

As noted in the Description of Assessment Area section of this Evaluation, the lending opportunities are limited because of several obstacles related to affordable housing development. In response, the bank has been very aggressive in working with community organizations to pursue the opportunities that are available. Citibank made 8 community development loans during this evaluation period totaling \$2.3 million. This significantly exceeded the amount of such lending by similarly situated banks in the community. The loans helped finance affordable housing developments, including two projects which serve low-income families. One of the loans, amounting to \$400,000, benefitted the larger statewide area.

The bank has undertaken a number of community economic development efforts. The most notable of these is the creation of the Community Lending Center in North Las Vegas mid-1998. The center, which is designed to facilitate community development lending in LMI areas, made nearly 100 loans during the first six months of operations, including a \$700,000 loan to an affordable housing development, and a \$1.2 million loan commitment to another organization which promotes affordable housing.

Product Innovation and Flexibility

The bank has a variety of proprietary loan programs, and also participates in various state, municipal, and Community Development Corporation (CDC) first-time home buyer programs. Some are tailored to the specific marketplaces of its branches. These products have many flexible underwriting features, and some have innovative designs to provide credit to certain industries or constituencies. Lending efforts have been focused on generating first time home buyer mortgage loans to LMI households and unsecured home improvement loans in amounts of \$500 to \$15,000 to households in LMI census tracts.

Citibank's affiliates have a number of loan programs which are available in all of the bank holding company's geographies. This bank uses many of them, including the following:

- < CitiAffordable Purchase Assistance Program is an innovative first-time home

buyer program which is available only in Citigroup's assessment areas. Home purchase down payments may be as low as \$500, and underwriting terms are modified to provide substantial flexibility to qualify LMI home buyers.

- < An innovative and flexible unsecured installment loan program provides additional funds that may be needed for a first mortgage. The effect of the program allows the borrower to shore up secured credit with unsecured financing.
- < Special Markets Pilot Loan Program (SMPLP) is an innovative special purpose program, which makes capital available to certain businesses that historically have had difficulty obtaining capital. These have the characteristics of involvement with newer technologies, creation of a greater number of jobs, export businesses, and businesses owned by minorities, women, or veterans. The program is unusual because the bank is offering capital funding to small businesses that have difficulty accessing capital markets.
- < Sure Start is a flexible program which provides pre-approved credit and loan commitments prior to choosing a home.
- < The bank participates in four special mortgage assistance programs specific to the Southern Nevada community.

During this evaluation period the bank made 90 loans for \$8 million from these special programs. The distribution of these loans was considered in the geographic and borrower distribution analysis of HMDA and small business reportable loans.

INVESTMENT TEST

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank's level of investments is excellent and significantly exceeds that of local peer banks. During this evaluation period, Citibank has approximately \$44 million in qualified investments. This represents an increase of 12 times over the level of investments made by the bank in the prior evaluation period. The bank made \$41 million (94 percent) of the investments during this evaluation period. The nature, scope, and type of investments demonstrate the bank has responded positively to

community needs. The manner in which the bank responded demonstrates flexibility and commitment to its community partners. Citibank obtained input from various community based organizations, and based the investment strategy, in part, on findings of two commissioned studies of its assessment area.

The majority of the bank's investment portfolio (\$33 million) consists of targeted mortgage backed securities, Nevada housing bonds, Low-Income Housing Tax Credits (LIHTCs), and investments in intermediaries. The bank made \$30 million of these investments during this evaluation period. \$14 million was directly invested in the assessment area and \$3 million was invested in state-wide programs. The remaining \$13 million was invested in LMI mortgages in Nevada, where 72 percent of the population resides in the bank's assessment area.

The portfolio of Nevada mortgages, of which 98 percent are to LMI households, are issued by the Nevada Housing Division of the Department of Commerce. The loans are for first time home buyers or for affordable multifamily housing. While families of up to 120 percent of area median income may qualify for the program, the bonds purchased by Citibank are at or below 80 percent of area median income. These bonds are the taxable portions of the issues with a maturity of 12 years. There is very limited demand for the taxable portion of such issues, thus, this is not an investment routinely provided by other investors. The bonds most recently purchased by the bank were to finance residential projects in the bank's assessment area consisting entirely of units affordable to households earning 60 percent or less of area median income, another feature not routinely purchased by other investors.

Citigroup has participated in the LIHTC program since its inception in 1986. During this evaluation period, 69 percent of Citibank's investments in LIHTCs have been in its assessment area. These are financing new construction by a partnership of two nonprofits, which is providing housing for formerly homeless individuals earning below 30 percent of median income. This project represents an innovative approach by providing housing and counseling services to very low income people. Because it reaches those trying to re-enter society's mainstream, it is not a routinely provided investment in Nevada.

Citibank has targeted a number of civic and community economic development organizations and activities to which it has made investments and contributions. All of these investments provide benefit to LMI individuals and/or geographies. However, the following are worthy of particular mention.

- < \$500,000 investment in a loan pool created to support entrepreneurial firms contributing to local economic development and diversification. This

provides gap financing to small businesses that have high potential growth and earnings, but which lack the necessary funds to achieve their goals. Citibank is one of the two largest investors in a consortium of 23 financial institutions contributing equity and debt to the capital structure of this nonprofit. During this evaluation period the pool funded 14 loans to non-bankable small businesses.

- < \$250,000 investment in a national intermediary that supports community development by working with Community Development Corporations (CDCs). The group has offices throughout the country (the bank was instrumental in establishing the group's Las Vegas office.) The intermediary provides loans to CDCs for housing development, related property acquisition and early predevelopment financing in LMI communities. During a five year period the intermediary expects to recycle the bank's investment three times. To date the investment has funded a loan to a Las Vegas CDC to build four single family residences for low-income families.
- < \$200,000 has been deposited in community development credit unions, which enable the credit unions to make loans to local non-bankable small businesses. These businesses are located in the local Enterprise Community (part of HUD's Enterprise Zone Program).
- < Approximately \$100,000 in grants have been made to several economic literacy training, financial services and consumer related curricula targeting at-risk and LMI youth. One program in particular provides training for teachers who work with at-risk and LMI students to enhance the opportunities for them to attend college.
- < \$90,000 was contributed to an economic diversification initiative which seeks to achieve long term revitalization and stabilization while providing job training and employment to those currently unemployed or underemployed. The initiative established a technical training program through the local secondary and post secondary education system. With so much transience among lower income employees in Las Vegas, this program provides sustainable careers to LMI workers. Additionally, it features a welfare-to-work initiative, which provides education, job training, and counseling to welfare recipients transitioning into the workforce.
- < \$50,000 was contributed for micro enterprise lending and technical assistance programs.
- < \$65,000 was contributed for home buyer development and first time home

buyer counseling initiatives.

SERVICE TEST

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

Delivery systems are accessible to essentially all geographies and individuals of different income levels in Citibank's assessment area. The bank delivers products and services through an integrated system of traditional offices and state-of-the-art technology. It is an acknowledged leader in banking technology and a major portion of the consumer banking is transacted through nontraditional banking systems.

Citibank provides banking services in the Las Vegas assessment area through four full-service branches and a Community Lending Center. In addition, Citibank has 39 ATMs located in bank branches, Kinko's Copies stores, Blockbuster Video stores, and at the Community Lending Center. Three of the Kinko's sites have staffed banking kiosks which include interactive video terminal banking pods that allow customers to apply for a loan, open a deposit account, or open an investment account. These sites also provide a separate terminal allowing customers to access other information and articles relating to personal finances, and with the ability to print the information for the customer.

Of the four branches, one is located in a moderate-income census tract with the remainder in upper-income census tracts. The Community Lending Center, which opened in May 1998, is located in a low-income census tract. During June, 1998 two branches approximately 1.5 miles apart were consolidated into one. The Maryland Parkway branch, located in a middle-income census tract, was closed and consolidated into the Park branch. The Park branch is located in a moderate-income census tract. The consolidation of these branches has not adversely affected the accessibility of its delivery systems particularly in LMI geographies or to LMI individuals. Also, 81 percent of the population lives in middle and upper-income census tracts.

Full service branches all offer normal hours of operation as follows: Monday through Thursday, 9:00 to 4:00; Friday, 9:00 to 5:00; and Saturday, 9:00 to Noon. Staffed Kinko's centers operate Monday through Friday, 9:00 to 6:00 and

Saturday, Noon to 4:00. The video bank deposit and loan application feature at Kinko's is only in operation Monday through Friday. Full-service ATM sites, including three Kinko's sites, are available 24 hours a day, and includes Citiphone banking. The remaining ATM sites that are not available 24 hours have extended hours. Banking hours and services do not vary in a way that inconveniences LMI individuals living within the assessment area.

Citibank provides numerous alternative systems for delivering retail banking services, some of which are innovative and reflect a leadership position in banking technology. These include ATMs, phone banking, personal computer banking, interactive computer terminal banking, and the Community Lending Center. The interactive banking computer terminals located in three of the Kinkos Copies stores use leading edge technology and reflect an innovative approach to delivering retail banking services. Each of these stores has two of these video display terminals in a small kiosk that allows customers to apply for a loan, open a deposit account, or inquire about an investment. These video display terminals allow both the bank representative and customer to view and talk to each other while conducting the transaction interview. Optical scanners are used to transmit signed applications, deposit contracts, identification and delivery of disclosures to/from the remote location. Citibank leads the market in this technology as no other bank in the assessment area offers such an advanced service delivery system.

Full service ATMs (those that take deposits, allow various customer transactions and dispense cash) are located at all branches, the staffed Kinko's sites, and at the Community Loan Center. These ATMs provide instructions in seven languages. Each of the sites with full service ATMs also includes phone banking as well. A customer service representative can be reached by phone 24 hours a day. Citibank also has located 20 ATMs in Blockbuster Video stores throughout the assessment area. These ATMs, as well as the two unstaffed Kinko's sites, are limited to cash dispensing and customer inquiries.

Citibank conducted a six month study of transactions (with the exception of checks written) conducted through various access points such as ATMs, telephone, PC Banking, Direct Deposit, and bill payment. The study covered all bank customers and customers who live in LMI census tracts. The analysis depicted by the table below indicates that customers living in LMI census tracts are equally or more likely to use ATMs, telephones (both automated voice response and customer service representatives), and direct deposit. Customers living in LMI census tracts are slightly less likely to use PC Banking.

Delivery Systems Study		
Alternative Access Options	Percent of Transactions	
	All Customers	Customers Who Live in LMI Census Tracts
ATMs	29	33
Telephone	7	10
PC Banking	22	14
Direct Deposit/Transfers	5	4

Community Development Services

Citibank demonstrates leadership in providing community development services. Citibank has developed a methodical and strategic approach to supporting and delivering community development services to where they are most needed and have the greatest opportunity to succeed. This strategy was derived from two principal studies the bank commissioned in late 1997 and early 1999. These studies identified major community development needs in the assessment area and potential partnership opportunities with local and national community development providers.

The bank has also recognized that community organizations, which are involved in community development, have slight infrastructures and require assistance in preparing plans and managing finances. As a result, bank management has provided assistance to these organizations.

The major community development needs the bank has chosen to focus on as a result of the above-mentioned studies and surveys of local community groups include:

- < developing multi-family affordable housing by working with local nonprofit and for-profit developers, community groups, and government agencies;
- < improving accessibility for LMI customers by developing user friendly delivery systems and offering products supported by educational and technical assistance; and,
- < developing strong partnerships by offering long term financial and technical support with selected community development organizations that have the

greatest likelihood of achieving success in addressing the identified needs.

Citibank used an innovative approach that demonstrated leadership in community development by opening the Community Lending Center (CLC) in a low-income census tract in depressed and blighted North Las Vegas in May 1998. This demonstrated a significant commitment and responsiveness to the credit needs of LMI individuals in the area. The first such operation in the Citibank family, it was opened in response to findings and recommendations in a study commissioned by the bank, as well as articulated community needs. The primary strategy for opening this facility as a store front in a strip shopping center was to offer the surrounding community a wide array of loan products at a convenient location without being intimidating. Signs indicate that this is only a Community Lending Center and not a branch of a large bank network, such as Citibank. Loan products are tailored to meet the needs of the surrounding community and include small personal loans, secured and unsecured home improvement loans, and special purpose mortgage loans. This facility is not a full service retail branch (as this facility is not considered a branch), however, there is an adjacent full service ATM and loan by phone available 24 hours.

Staffing of the CLC also reflects Citibank's commitment to the local community. The bank's CRA officer manages the CLC and spends a substantial amount of time interfacing with community groups. The CLC has a full-time consumer loan officer as well as two mortgage loan officers. The recently hired, full-time community mortgage lenders cater to LMI credit needs. These lenders also conduct home buying seminars, participate in home buyer fairs, Realtor conferences and other related activities. The lenders have flexible hours for serving the credit needs of the local community, by making appointments outside of normal business hours and traveling to the customer's home or place of business to take applications. Additionally, the bank hired a community development lender who concentrates on structuring permanent funding for affordable housing projects. This lender works closely with developers, community organizations, and local government agencies.

The CLC offers a large conference room, without charge, for the use of local nonprofits and community groups. Citibank also sponsors small business networking events, meetings, and lending and financial planning seminars for local community members and groups.

Citibank offers financial and technical support to numerous organizations that provide a full range of services for affordable housing, and to a lesser extent, small businesses. During the evaluation period bank staff offered qualified community development services to 67 organizations through approximately 249

contacts, projects and meetings. This represents hundreds of hours of donated service time. Examples of some of these organizations include:

- < A nonprofit that addresses housing issues primarily impacting women, such as support services, transition housing, affordable rentals, and home ownership for low-income families. Citibank provides funding for this organization and technical assistance with the bank's CRA officer serving on the organization's board and assisting with budgets and specific project reviews.
- < A national nonprofit that provides financial and technical assistance to CDCs that are involved in improving housing and economic development in LMI communities and neighborhoods. Citibank provides major funding through below market rate loans. It also provides technical expertise of two bank representatives, one serving on the advisory board and the other serving on the project review committee.
- < A local nonprofit LMI multi-family housing developer by providing operations financing and having a Citibank community development lender serving on the board.
- < A local nonprofit development CDC serving LMI communities by providing entrepreneurial training, technical assistance and loans for new and expanding businesses. Citibank funded the start-up of this organization in Las Vegas and provides ongoing support. During the evaluation period this organization conducted eight workshops for small businesses. Citibank officers provided technical assistance by participating on three loan review committees and 24 board meetings.

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.

Time Period Reviewed	Lending Test: January 1, 1997 to December 31, 1998 Investment Test: May 7, 1997 to March 29, 1999 Service Test: May 7, 1997 to March 29, 1999	
Financial Institution	Products Reviewed	
Citibank (Nevada), N.A. (Citibank) Las Vegas, Nevada	Home improvement loans, small business loans, investments and grants.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Citibank, FSB	Holding Company Affiliate	Home purchase loans
Citibank Mortgage, Inc.	Holding Company Affiliate	Home purchase loans
Citicorp North America, Inc.	Holding Company Affiliate	Investments
Citigroup Foundation	Holding Company Affiliate	Grants and contributions.
Salomon Smith Barney	Holding Company Affiliate	Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Las Vegas MSA	Full-Scope	

Appendix B: Demographic Information

Las Vegas MSA

Demographic Information for Full-Scope Area: Las Vegas MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	120	6	18	48	28	0
Population by Geography	741,459	3	16	48	33	0
Owner-Occupied Housing by Geography	149,007	1	8	47	44	0
Businesses by Geography	29,233	5	14	48	33	0
Family Distribution by Income Level	191,468	18	18	23	41	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$35,172 = \$46,900 = 10.0%	Median Housing Value Unemployment Rate (Dec-31-98)			= \$93,457 = 4.0%	

Source: 1990 U.S. Census and 1998 HUD updated MFI.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated 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 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME		State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998						
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Las Vegas Assessment Area	100%	2,588	172,446	242	20,666	0	\$0	8	\$2,309	2,838	\$195,421	94%

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE		State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998										
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area**	1%	1%	8%	9%	46%	26%	45%	57%	50	.50%	.40%	.69%	.42%	.32%	538	100%

(*) Based on 1997 Aggregate HMDA Data only.

(**) Due to changes in the assessment area, we were not able to determine census tract designation for 7% of the loans.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT					State: NEVADA		Evaluation Period: January 1, 1997 to December 31, 1998									
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area	1%	2%	8%	15%	46%	42%	45%	41%	29	.59%	0%	1.03%	.58%	.56%	1,245	100%

(*) Based on 1997 Aggregate HMDA Data Only.

Table 4. Geographic Distribution of Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE					State: NEVADA		Evaluation Period: January 1, 1997 to December 31, 1998									
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans	% Owner OCC Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area**	1%	< 1%	8%	3%	46%	22%	45%	73%	26	1.02%	.72%	.94%	.72%	.25%	802	100%

(*) Based on 1997 Aggregate HMDA Data only.

(**) Due to changes in the assessment area, we were not able to determine census tract designation for 1% of the loans.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS				State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area	5%	3%	14%	6%	48%	43%	33%	48%	11	1.4%	1.3%	1.0%	1.4%	1.9%	242	100%

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM				State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																	State: NEVADA		Evaluation Period: January 1, 1997 to December 31, 1998				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Las Vegas MSA	18%	11%	18%	41%	23%	15%	41%	21%	50	.50%	1.1%	1.2%	.20%	.49%	538	100%							

(*) As a percentage of loans with borrower income information available. No information was available for 12% of loans originated by Citibank (Nevada), N.A.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: NEVADA		Evaluation Period: January 1, 1997 to December 31, 1998				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
Las Vegas Assessment Area	18%	8%	18%	16%	23%	14%	41%	14%	29	.59%	.90%	.57%	.54%	.59%	1,245	100%							

(*) As a percentage of loans with borrower income information available. No information was available for 48% of loans originated by Citibank (Nevada), N.A.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE				State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Las Vegas Assessment Area	18%	9%	18%	29%	23%	14%	41%	38%	26	1.02%	1.3%	1.6%	.77%	1.1%	802	100%

(*) As a percentage of loans with borrower income information available. No information was available for 10% of loans originated by Citibank (Nevada), N.A.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS			State: NEVADA			Evaluation Period: January 1, 1997 to December 31, 1998					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Las Vegas Assessment Area	71%	34%	43%	187	47	8	1.4%	1.1%	242	100	\$82

(*) As a percentage of businesses with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for XX% of loans originated by BANK.
 (***) The market consists of all other Small Business reporters in BANK's assessment area and is based on 1997 Aggregate Small Business Data only.
 (****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM			State: NEVADA			Evaluation Period: January 1, 1997 to December 31, 1998					
MSA/Assessment Area: Las Vegas	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms	% BANK Loans	% Market Loans	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Las Vegas Assessment Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 12. Qualified Investments

QUALIFIED INVESTMENTS			State: Nevada			Evaluation Period: January 1, 1997 TO December 31, 1998			
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Las Vegas MSA	3	2,780	6%	13	40,872	94%	16	\$43,652	100%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: NEVADA				Evaluation Period: January 1, 1997 to December 31, 1998									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Las Vegas MSA	100%	4	100%	0	25%	0	75%	39	100	3%	10%	20%	67%	3%	16%	48%	33%